## COMMONWEALTH OF PENNSYLVANIA COUNTY OF: ALLEGHENY

MDJ: Hon, ANTHONY L DELUCA Magisterial District Number: 05-2-06 Address: 85 UNIVERSAL ROAD

PITTSBURGH, PA 15235



# POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT: KEITH (NAME and ADDRESS):

QUARLES

First Name

Middle Name

Last Name

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Defendant Name	First: KEITH	Middle:	Last QUARLES

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient, in a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. In addition, social security numbers and financial information (e.g. PINS) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§213.1 – 213.7.)

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Defendant Name	First KEITH	Middle	Last: QUARLES

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## POLICE CRIMINAL COMPLAINT

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		G 823060-0	N-1209		
Defendant Name	First: KEITH	Middle:	Last QUARLES		

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 PA.C.S.§4904) relating to unsworn falsification to authorities.
- 4. This complaint is comprised of the preceding page(s) numbered through
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

	1.8-18	(Signature of Affiant)
AND NOW, on this date  An affidavit of probable cause must be completed by		has been properly completed and verific
(Magisterial District Court Number)	(Issuing Authority)	SEAL



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Defendant Name	First KEITH	Middle	Last: QUARLES

#### AFFIDAVIT of PROBABLE CAUSE

#### 1. WHEN:

a) Date when Affiant received information:

11/07/2018

b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information: 11/07/2018

#### 2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):
   Observations made by Co-Affiants
- b) How the source of information knows this particular person committed the crime:

Observations made by Co-Affiants

How both Affiant and/or source of information knows that a particular crime has been committed:
 Observations made by Co-Affiants

#### 3. WHAT CRIMES:

18 911 B4 CORRUPT ORGANIZATION
35 780-113 A16 PROHIBITED ACTS - POSSESSION
35 780-113 A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV
35 780-113 A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV

#### 4. WHERE CRIME(S) COMMITTED:

VARIOUS LOCATIONS, ALLEGHENY COUNTY, PENNSYLVANIA

#### 5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.

Source has given information in the past which has led to arrest and/or conviction

Defendant's reputation for criminal activity

This source made declaration against his/her penal interest to the above offense

Affiant and/or other Police Officers corroborated details of the information



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- 1. Your Affiant is Detective Nathan Laero of the Penn Hills Police Department. I am a law enforcement officer within the meaning of 5702 of the Pennsylvania Crimes Code and such are empowered to make arrests for criminal offenses enumerated therein.
- 2. Your Affiant has been a police officer for approximately 15 years. Over the course of my employment as a Police Officer, I have been involved in hundreds of drug and criminal investigations and incidents in the federal and state court systems as a uniform patrol officer and a plain clothes detective. These investigations and incidents include but are not limited to narcotics violations, undercover purchases and controlled purchases of illicit narcotics, controlled purchases of narcotics through the use of confidential informants, and the execution of search warrants which resulted in the seizure of controlled substances. I have worked as a task force officer investigating violations of the CSDDCA (the Controlled Substance, Drug, Device, and Cosmetic Act). I am currently assigned as a narcotics detective specifically assigned to the Narcotics Division of the Penn Hills Police Department.
- 3. Your Affiant has been directly involved in numerous undercover narcotics operations, and have personally conducted numerous undercover narcotics buys for controlled substances. I have served as a monitor on non-consensual interceptions of oral and wire communications in drug investigations, as well as performing surveillance on drug users and traffickers and conducting trash pulls. Further, I have debriefed numerous informants, drug users and dealers about illegal drug trafficking, the codes and cryptic language used by drug users and drug dealers, and the methods and practices used by drug dealers in the furtherance of their drug trafficking enterprise.
- 4. Your Affiant has attended numerous training courses offered by the Pennsylvania State Police, the Federal Bureau of Investigations (FBI), the District Attorney of Allegheny County, and other law enforcement agencies relating to criminal investigations of violations of CSDDCA. In September of 2013 I attended training on Street Crimes which included the use of informants, surveillance techniques and the investigation of drug and violent crimes. In May of 2014 I attended Basic Narcotics Investigator training given by MAGLOCLEN. This training included the identification of narcotics, how they are manufactured and used by users, dealers and manufacturers, the affect on users as well as training and certification in the use of field testing kits for narcotics. In May of 2014 I attended Basic Drug Investigators' Training given by the Allegheny County District Attorney's Office and the District Attorney's Narcotics Enforcement Team. This training was for the basic investigation skills needed to build successful drug investigations. In March of 2015, I completed the Class "A" Pennsylvania State Police Wiretapping and Electronic Surveillance Training School as mandated by 18 Pa. C.S.A. 5742 and received Class "A" Certification number A-4995. In April of 2017 I completed the Class "B" Pennsylvania State Police Wiretapping and Electronic Surveillance School as mandated by 18 Pa. C.S.A. 5742 and received Class "B" Certification B-329. I have participated in numerous non-consensual electronic surveillance investigations either as a monitor and/or as a surveillance officer.
- 5. Your Co-Affiant, Joseph D. Barna, a Narcotics Agent II employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your Co-Affiant has been a sworn law enforcement officer since January of 2009. Your Co-Affiant, from January of 2009 to August 2012 was an Indiana County Probation Officer. Your Co-Affiant, from August of 2012 until November of 2015 was a Pittsburgh Police Officer. Since November of 2015, your Co-Affiant has been employed with the Pennsylvania Office of Attorney General in the Bureau of Narcotics Investigation and Drug Control. Your Co-Affiant is currently assigned to the North Huntingdon Office, Narcotics Division. As a Narcotics Agent of the Pennsylvania Office of the Attorney General, Bureau of Narcotics Investigation and Drug Control, your Co-Affiant is empowered by law to conduct investigations of, and to make arrests for offenses involving violations of the Controlled Substance, Drug, Device and Cosmetic Act and related offense under the Pennsylvania Crimes Code.
- 6. Your Co-Affiant, while employed as a Narcotics Agent II, Pittsburgh Police Officer, and Indiana County Probation, has been involved in hundreds of investigations concerning narcotics violations and of the Controlled Substance, Drug, Device and Cosmetic Act. While employed at the city of Pittsburgh Police, your Co-Affiant worked as a Patrol Officer, Zone Detective and Narcotics Detective. During my career as a Pittsburgh Police Officer, your Affiant had been involved in hundreds of arrests and convictions.



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Specifically, your Affiant has made over 100 arrests for violations of the Drug Device and Cosmetic Act, resulting in numerous convictions for these offenses.

- 7. Your Co-Affiant has applied for, obtained and executed search warrants, as well as made seizures of narcotics, firearms and other materials involved in the packaging and distribution of narcotics. Your Co-Affiant has been involved in numerous undercover purchases of controlled substances. Your Co-Affiant has extensively interviewed dozens of individuals involved in selling or using of illegal narcotics. These individuals have provided your Co-Affiant with detailed information concerning the terminology of the sale of narcotics, how illegal narcotics are sold, manufactured, cultivated and used. Your Co-Affiant has attended numerous trainings and academies as a Probation Officer, Police Officer and Narcotics Agent.
- 8. In January of 2018, your Co-Affiant competed the Class "A" Pennsylvania State Police Wiretapping and Electronic Surveillance Training School as mandated in Title 18 Pa. C.S. § 5724 and received Class "A" certification Number A-5494. I have participated in two (2) non-consensual electronic surveillance investigations with the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control, as a surveillance and monitoring Agent.
- 9. As a result of our training, education and experience, Your Affiants have extensive knowledge regarding illegal drugs, packaging and concealment methods, the coded language utilized by traffickers, as well as the methods utilized by illegal drug traffickers in the sale and distribution of controlled substances. Your Affiants are also familiar with tactics used by narcotic traffickers to elude the efforts of law enforcement while participating in the sale, delivery and acquisition by misrepresentation of illegal and scheduled drugs. Your Affiants are investigative or law enforcement officers of the Commonwealth of Pennsylvania within the meaning of the Pennsylvania Crimes Code.
- 10. Based on the training knowledge and experience of your Affiants, we have learned the following in connection with investigating those involved in illegal trafficking of controlled substances:
- 11. The facts and information contained within this affidavit were acquired as the result of an ongoing investigation, and they were obtained either directly by me and/or other detectives/officers/agents involved in the investigation. The beliefs, conclusions, and opinions expressed herein are based on my training and experience in the area of narcotics investigations, combined with the facts and circumstances that developed during the course of the is ongoing investigation.
- 12. On October 25, 2018, Josh Shapiro, Attorney General of the Commonwealth of Pennsylvania, signed an Application for an Order Authorizing the Interception of Wire and Electronic Communications on the Sprint telephone facility bearing telephone number (412) 857-1179, which is utilized by Keith Quarles.
- 13. On October 26, 2018, the Honorable Judge Mary P. Murray of the Pennsylvania Superior Court signed an Order Authorizing the Interception of Wire and Electronic Communications on Quarles' cellular telephone number (412) 857-1179. The Order was docketed in the Superior Court under Miscellaneous Confidential Docket No. 12-1 W.D. 2018.
- 14. Interceptions began on October 26, 2018 at 3:29 P.M. Your Affiant has reviewed all conversations recorded under Miscellaneous Docket No. 12-1 W.D. 2018. Based on our training and experience, Your Affiants believe that the conversations intercepted on Quarles' cellular phone number, (412) 857-1179, show that he is involved in an ongoing conspiracy to obtain and distribute cocaine with Sharron Fields in Allegheny County, Pennsylvania. In addition, the conversations show that Sharron Fields is the main supplier of cocaine to the organization and that Keith Quarles is one of the main distributors of cocaine.



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- 15. Your Affiants has reviewed all incoming and outgoing phone calls and/or SMS messages to/from cellular telephone number (412) 857-1179. Your Affiants have reviewed all surveillance reports related to the investigation. Your Affiants believe that probable cause existed that show Sharron Fields is using cellular telephone number (412) 589-8001 in furtherance of his cocaine distribution network.
- 16. On November 2, 2018, Session 00151 at 12:17 P.M.: Fields telephone number 412-589-8001 placed an outgoing telephone call to telephone number 412-857-1179, which is being utilized by Keith Quarles. Fields tells Quarles that he was about to hit the park way and will be there in about 25 minutes. Your Affiant believes based on the investigation that Fields is telling Quarles to meet him somewhere to supply him with more cocaine.
- 17. On November 2, 2018 at approximately at 12:42 P.M., surveillance officers were conducting surveillance at 9929 Frankstown Road, Apartment Number 1, Penn Hills, Allegheny County, Pennsylvania. Surveillance officers identified Fields operating a black Chevrolet Tahoe, bearing Pennsylvania Registration KMC6892, pull into the driveway of 9929 Frankstown Road and park. At the same time, surveillance officers identified Quarles, operating a blue Buick sedan, bearing Pennsylvania Registration KMF2804, pull up beside Fields and park. Fields and Quarles exited their vehicles and surveillance officers identified them entering 9929 Frankston Road, Apartment Number 1. After a period of time, Fields and Quarles exit 9929 Frankstown Road, Apartment Number 1 and are observed departing the area in their vehicles. Based on your Affiants training and experience along with Interceptions of Wire and Electronic Communications on phone numbers 412-589-8001 and 412-857-1179 utilized by Fields and Quarles, your Affiant believes that Quarles received crack cocaine from Fields and Quarles will began to distribute his the cocaine.
- 18. On November 1, 2018, Josh Shapiro, Attorney General of the Commonwealth of Pennsylvania, signed an Application for an Order Authorizing the Interception of Wire and Electronic Communications on the Sprint telephone facility bearing telephone number (412) 589-8001, which is utilized by Sharron Fields.
- 19. On November 2, 2018, the Honorable Judge Mary P. Murray of the Pennsylvania Superior Court signed an Order Authorizing the Interception of Wire and Electronic Communications on Fields' cellular telephone number 412-589-8001. The Order was docketed in the Superior Court under Miscellaneous Confidential Docket No. 12-2 W.D. 2018.
- 20. Interceptions began on November 2, 2018 at 3:29 P.M. Your Affiant has reviewed all conversations recorded under Miscellaneous Docket No. 12-2 W.D. 2018. Based on our training and experience, Your Affiant believes that the conversations intercepted on Fields' cellular phone number, (412) 589-8001, show that he is involved in an ongoing conspiracy to obtain and distribute cocaine with Keith Quarles and others in Allegheny County, Pennsylvania. In addition, the conversations show that Sharron Fields is the main supplier of cocaine to the organization and that Keith Quarles is one of the main distributors of cocaine.
- 21. Your Affiant has reviewed all incoming and outgoing phone calls and/or SMS messages to/from cellular telephone number (412) 589-8001. Your Affiant has reviewed all surveillance reports related to the investigation. Your Affiant believes that probable cause existed that show Sharron Fields is using cellular telephone number (412) 589-8001. The following are pertinent phone calls, obtained pursuant to Miscellaneous Docket No. 12-2 W.D. 2018.
- 22. On November 7, 2018 at approximately 3:21 P.M., pertaining to session 01027, Fields telephone number 412-589-8001 placed an outgoing phone call to telephone number 412-513-9859, which was being utilized by Keith Quarles. Fields tells Quarles to meet him at the apartment building. Your Affiant believes Fields is telling Quarles to meet him at 601 North Avenue, Pittsburgh, Allegheny County, Pennsylvania to conduct a cocaine transaction.

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- 23. Subsequently, surveillance officers identified Keith Quarles pull up to 601 North Avenue in a blue Buick Sedan bearing Pennsylvania Registration KMF2804, and meet Fields outside of the 601 North Avenue. Surveillance Officers observed fields remove something from his groin area and hand it to Keith Quarles. Keith Quarles then left the area of 601 North Avenue in a blue Buick Sedan bearing Pennsylvania Registration KMF2804. Fields returned to 601 North Avenue and entered. A short time later Fields left 601 North Avenue and entered his black Chevrolet Tahoe, bearing Pennsylvania Registration KMC6892 and left the area.
- 24. A traffic stop was conducted on the blue Buick being driven by Keith Quarles. A search of Quarles person yielded three (3), \$50 crack rocks from his hat. Quarles was placed into custody and transported to the Monroeville Police Station.

١,	NATHAN LAERO	, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY
THAT	THE FACTS SET FORTH IN THE	FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY
KNO	WLEDGE, INFORMATION AND BE	ELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this day of	Non	(Signature of Affiant)  (Signature of Affiant)  (Signature of Affiant)  (Signature of Affiant)	
My commission expires first Monday of January,  Jesse J. Cramer  State of Pennsylvania  Senior Magisterial District Judg	0 8	SEA!	