COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: CLEARFIELD COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 46-3-04 VS. MDJ: Hon. James B. Glass DEFENDANT: (NAME and ADDRESS): Address: PO Box 362 SONDRA MCOUILLEN 251 Spring Street (Suite #3) First Name Middle Name Houtzdale, PA 16651 3192 Sanborn RD Telephone: (814)378-7160 Houtzdale, PA 16651-8252 NCIC Extradition Code Type ☑ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States 2-Felony Limited Distance: ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ 8-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab 915118 Services? U623736-☑ YES ☐ NO BN-40223-17T GENDER ров 04/26/1965 ров Pennsylvania Add'l DOB Co-Defendant(s) X ☐ Male First Name Middle Name Last Name **SONDRA** AKA L. SCHMOKE-MCQUILLEN RACE White Hispanic Asian Black ETHNICITY ☐ Native American Unkaowa Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) Hair PLE (Purple) BRO (Brown) BLK (Black) ONG (Orange) Color WHI (White) XXX (Unk./Baid) GRN (Green) PNK (Pink) BLN (Blonde / Strawberry) BLK (Black) Eve BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) ☐ XXX (Unknown) DNA TYES NO DNA Location WEIGHT (Ibs.) FBI Number 509757FD2 MNU Number 180 Defendant Fingerprinted ☐ YES ☐ NO FL HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth. NCIC Veh. Code Plate # Reg. mat Sticker (MM/YY) Ind. П same VIN as Def. Make Model Style Color Office of the attorney for the Commonwealth Approved: Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior SDAG MICHAEL MADEIRA (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) AGENTS D. MORGAN / 1. VESNESKY #369 / 348 (Name of the Affiant (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400: (Police Agency ORI Number) do hereby state: (check appropriate box) 1. 図 I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as [] accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [(Subdivision Code) (Place-Political Subdivision) in CLEARFIELD County [17] on or about SEPTEMBER 2017 THROUGH JULY 2018 (County Code)

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Docket Number: (R-)26-18	Date Filed:	OTN/LiveSca U 62373/0		POLICE CRIMINA Complaint/Incider	it Number
Defendant Name:	First: SONDRA	Middle: L.		BN-40223-17T Last:	
			· · · · · · · · · · · · · · · · · · ·	MCQUILLEN	
Without more in not auto-	to least sufficient to advit to least summary case, you me of the offense may be i account must be establish	se the defendant of the na must cite the specific sec	ture of the offense	e(s) charged. A citation to the st	
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PA Statute (Title)

Acts of the accused associated with this Offense: In that the above named Defendant did deliver or possess with the intent to deliver a controlled substance while not being registered under this Act; TO WIT: In February, 2018, in Clearfield and surrounding counties, the Defendant did deliver or possess

Statute Description (include the name of statute or ordinance): DELIVERY/POSSESSION WITH THE INTENT TO DELIVER A CONTROLLED SUBSTANCE (TITLE 35; 780-113(A)(30))

☐ Interstate

AOPC 412A - Rev. 7/18

Offense#

PennDOT Data

(if applicable)

Subsection

with the intent to deliver Methamphetamine, a Schedule II Controlled Substance, in violation of the Act.

Accident

Number

☐ Work Zone

NCIC Offense Code

☐ Safety Zone

Defendant Name: Defendant Name:	Docket Number:	Date Filed:	0.711	🥸 PC	DLICE CRIMINA	L COMPLAI
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cts of the accused associated with this Offense: In that the above named Defendant did deliver or possess with the Intent to deliver a period of the accused associated with this Offense: In that the above named Defendant did deliver or possess with the Intent to deliver a control of the Act. Attempt	ONTROLLED SUBSTANCE (TITLE 35: 780-112(A)	e or ordinance): DEI	IVERY/POSSESSION	WITH THE INTENT TO D	☐ Work Zone
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ts of the accused associated with this Offense: In that the above named Defendant did deliver or possess with the intent to deliver a controlled substance while not being registered under this Act; TO WIT: In April, 2018, in Clearfield and surrounding counties, the Defendant did deliver or possess with the intent to deliver Methamphetamine, a Schedule II Controlled Substance, in violation of the Act. Chicate	atute Description (include	the name of statute	or ordinance): DELT	VERY/POSSESSTON	MITH THE TAXESTON	☐ Work Zone
6 780-113 (A)(30) of the 35 1 F	stance while not being register intent to deliver Methamphetar	ed under this Offense ed under this Act; TO WIT mine, a Schedule II Contro	I: In that the above nam T: In April, 2018, in Clear Siled Substance, in violati	ed Defendant did delive field and surrounding co ion of the Act.	er or possess with the intent punties, the Defendant did d	to deliver a controlled eliver or possess with
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TROUGH SUBSTANCE (TITLE 35; 780-113(A)(30)) of the accused associated with this Offense: In that the above named Defendant did deliver or possess with the intent to deliver a countries while not being registered under this Act. TO Mark the above named Defendant did deliver or possess with the intent to deliver a countries to being registered under this Act. TO Mark the above named Defendant did deliver or possess with the intent to deliver a countries.	(if applicable)	mber !	1	Interstate	Coset 7	
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	of the accused associat	ed with this Offense:	In that the above name	d Defendant did deliver		

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Defendant N	lame:	First: SONDRA	Middle:		BN-40223-17T		
100 100 100		SONDRA	<u>.</u> L.		MCQUILLEN		
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Offense	18 901 A	18 902 A	18 903	Number	of Victims Age 60 or Older		
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Acts of the a	ccused assi	ociated with this Offer	ise: In that the above nar	ned Defendant did d	eliver or possess with the inte		
the intent to del	not being regi iver Methamat	stered under this Act; TO	NIT: In June 2018, in Clea	field and surroundin	eliver or possess with the inte g counties, the Defendant did	nt to deliver a controlled	
		reaction of a seried die 11 CO	WIT: In June 2018, in Clea ntrolled Substance, in viola	tion of the Act	o and and an anidatic and	deliver or possess with	
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Substance while n	ot being regist	ered under this Act; TO W	IT: In July 1 through July 2	ed Derendant did deli 5. 2018. in Clearfield	iver or possess with the intent I and surrounding counties, th	to deliver a controlled	
- Passas Mar ar	e litterit to des	iver Methamphetamine, a :	IT: In July 1 through July 2 Schedule II Controlled Subs	tance, in violation of	the Act	e Defendant did deliver	
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Inchoate [Attempt	☐ Solicitation	☐ Conspiracy				
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tatute Descrip	tion (include	the same of stable		☐ Interstate	☐ Safety Zone	☐ Work Zone	
UBSTANCE (TIT	LE 35; 780-1	13(A)(30))	or ordinance): Posses	SION WITH THE I	INTENT TO DELIVER A CON	ITROLLED	
cts of the accu	ised associ	ated with this Offense	N. Y., 40				
hile not being reg	istered under t	this Act; TO WIT: On July	:. In that the above-named 26, 2018, in Clearfield and	Defendant did possi	ess with the intent to deliver a , the Defendant did possess v	controlled substance	
eliver Methamphel	tamine, a Sche	dule II Controlled Substan	ce, in violation of the Act.	surround countees	, the Derendant did possess v	vith the intent to	
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Docket Number:			A PC	DLICE CRIMINA	I COMPLAI
CR-126-18	Date Filed: 9 15/18	OTN/LiveScan		Complaint/Incident	Number Number
Defendant Name:	First: SONDRA	Middle:		BN-40223-17T	
Inchoate		Conspiracy 18 903	- -	CQUILLEN of Victims Age 60 or Older	
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nchoate	Solicitation	⊠ Conspiracy	Number of 1	Victime Age 22	
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atute Description (includ	TILE 18; 903(A)(1) - TIT	LE 35; 780-113 (A)(30)	RACY TO DELIVER	POSSESS WITH THE INT	ENT TO DELIVER
ts of the accused associate than one of them would entember 2017 and July 2018, mas, Donald Mullens, Jr., Jasossession with the intent to distribute Substances and in pur achoate.	on Merritts, Joyce Merritts, a leliver Methamphetamine, a suance of such conspiracy or	d other locations in Pennsy and others that they or mor	Ivania and Ohio, the	Defendant did conspire and	agree with James
Offense 18 901 A	Solicitation 18 902 A	☐ Conspiracy 18 903	Number of V	ictims Age 60 or Older	
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tute Description (include softhe accused associate the commission or the at			~ JOE OF A COMM	UNICATION FACILITY (T	TLE 18; 7512 (A))

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Docket Number: CR-126-18	Date Filed: 9 /5/18	OTN/LiveScan Nu		Complaint/Incident	L COMPLAIN
Defendant Name:	First: SONDRA	<i>U U 2 3 7</i> Middle: L.	La	BN-40223-17T st:	
Inchcate Attempt 18 901 A	Accident Subsection Accident Number Inde the name of statute sociated with this Offense veen September 2017 and Judgillo New York	of the 18 PA Statute (Title) or ordinance): DEALIN	Number of Counts Interstate GIN PROCEEDS County and other to	Grade NCIC Offense Co Saliety Zone FUNLAWFUL ACTIVITY	de UCR/NIBRS Code Work Zone (FIFLE 18;
Inchoate Attempt Offense 18 901 A 14 5111 Lead? Offense# Sec	Solicitation 18 902 A (A)(2) ation Subsection	Conspiracy 18 903	Number of	Victims Age 60 or Older	
PennDOT Data (if applicable)	Accident Number	PA Statute (Title)	T Interestate	Grade NCIC Offense Co	
Statute Description (include \$111(A)(2))	le the name of statute of	ordinance): DEALING	IN PROCEEDS OF	Safety Zone UNLAWFUL ACTIVITY	Work Zone
Acts of the accused associant unlawful activity; TO WIT: Betwee conduct financial transactions with designed in whole or in part to constitute of the conduct financial transactions with designed in whole or in part to constitute of the conduct financial transactions.	iated with this Offense: en September 2017 and July	In that the above-named D 2018, while in Clearfield Co	efendant did condu ounty and other loca	ct a financial transaction wi	th the proceeds of
Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number of Vic	tims Age 60 or Older	
□ 15 911	and the second of the second o	the 18	1 F1		
Lead? Offense# Section PennDOT Data A	n Subsection	PA Statute (Title)	Counts Gra	ade NCIC Offense Code	UCR/NIBRS Code
	umber	Cordinance): value	Interstate	☐ Safety Zone	☐ Work Zone
Acts of the accused associativity by an enterprise; TO WIT: Pennsylvania and Ohio, while emp Schedule II Controlled Substance, activity as defined in Title 18 Pa. C	loyed by or associated with a	an enterprise, did engage in	commerce consistir	ie in Cleartield County and o	other locations in

POLICE CRIMINAL COMPLAINT Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number -1210-18 5//8 1023736e-BN-40223-17T First: Defendant Name: Middle: Last: SONDRA L. MCQUILLEN Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Offense Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 16 911 (B)(4) of the 18 Lead? Offense# Subsection PA Statute (Title) PennDOT Data Counts Grade NCIC Offense Code Accident UCR/NIBRS Code (if applicable) Number ☐ Interstate Safety Zone ☐ Work Zone Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS (TITLE 18; 911(5)(4)) Acts of the accused associated with this Offense: In that the above-named Defendant did conspire to conduct or participate in the conduct of racketeering activity by an enterprise; TO WIT: Between and including September 2017 and July 2018, the Defendant, while in in Clearfield County and other locations in Pennsylvania and Ohio, while employed by or associated with an enterprise, did conspire and agree with James Thomas, Donald Mullens, Jr., Jason Merritts, Joyce Merritts, and others that they or one or more of them would engage in commerce consisting of the trafficking of Methamphetamine, a Schedule II Controlled Substance, and other Controlled Substances and conspiracy to traffic, in affairs of the said enterprise through a pattern of racketeering activity as defined in Title 18 Pa. C.S.A. § 911(h)(1), all of which is in violation of Title 18 C.S.A. § 911(b)(4). Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Offense Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 of the Offense# Lead? Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code PennDOT Data UCR/NIBRS Code Accident (if applicable) ☐ Interstate Number ☐ Safety Zone Work Zone Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense: Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 of the Lead? Offense# Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code PennDOT Data Accident

Interstate

Safety Zone

(if applicable)

Number

Acts of the accused associated with this Offense:

Statute Description (include the name of statute or ordinance):

□ Work Zone

Dealest N. J.			POLICE CRIMINAL COMPLAINT
Docket Number:	Date Filed:	// / 2 2 2 2 /	Complaint/Incident Number
Defendant Name:	First:	Middle:	BN-40223-17T
	SONDRA		MCQUILLEN

- 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
- 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 consists of the preceding page(s) numbered 1 through ____
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial Information and documents differently that 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.)

(Date)

(Year)

AND NOW, on this date

OS SEPT. 2618

I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

SEAL

POLICE CRIMINAL COMPLAINT

Docket Number: CR-126-18	Date Filed: 9 15/18	OTN/LiveScan Number	Complaint/Incident Number
Defendant Name:	First: SONDRA	Middle:	BN-40223-17T Last: MCQUILLEN

AFFIDAVIT of PROBABLE CAUSE

Your Affiants are Narcotics Agents D. Morgan and J. Vesnesky, Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control.

The Forty-Third Statewide Investigating Grand Jury, the Office of Attorney General, your Affiants, and Law Enforcement, have been conducting a criminal investigation into the suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act, by James Thomas, Donald Mullens, Jr., Sondra McQuillen, Jason Merritts, Joyce Merritts, and others.

Your Affiants allege that the evidentiary results of this investigation and the investigative efforts of the Statewide Grand Jury, as reported in Presentment number 3 of the Forty-Third Statewide Investigating Grand Jury, which is attached hereto and made part of this Affidavit of Probable Cause, demonstrates violation(s) of the Pennsylvania Controlled Substance, Drug, Device, and Cosmetic Act in Clearfield and surrounding Counties of Pennsylvania and the state of Ohio.

I, AGENTS D. MORGAN / J. VESNESKY, 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 KNOWLEDGE, INFORMATION AND BELIEF.

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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	MIS = F3(9) (Signature of Af	fiant)
Sworn to me and subscribed before me this day of	SUPT	2018
Date	, Magisterial Distric	ot Judge
My commission expires first Monday of January,	<u></u>	
Ð0∂Y	SEA	

IN THE COURT OF COMMON PLEAS ALLEGHENY COUNTY, PENNSYLVANIA

IN RE:

: SUPREME COURT OF PENNSYLVANIA

2 W.D. MISC, DKT, 2016

THE FORTY-THIRD STATEWIDE

: ALLEGHENY COUNTY COMMON PLEAS

INVESTIGATING GRAND JURY : CP-02-MD-121-2016

: NOTICE NO. 25

ORDER ACCEPTING PRESENTMENT NO. 3

- 1. The Court finds Presentment No. 3 of the Forty-Third Statewide Investigating Grand Jury is within the authority of said Grand Jury and is in accordance with the provisions of the Investigating Grand Jury Act, 42 Pa.C.S. § 4121, et seq. Accordingly, this Presentment is accepted by the Court.
- 2. The County for conducting the trial of all charges pursuant to this Presentment shall be Clearfield County.
- 3. The Attorney General of the Commonwealth of Pennsylvania, or his designee, is hereby authorized to prosecute as recommended in this Presentment by instituting appropriate criminal proceedings in the aforesaid County.

SO ORDERED this 15 day of August, 2018.

NORMAN A KRUMENACKER, III

Supervising Judge

The Forty-Third Statewide Investigating

Grand Jury

INTRODUCTION

We, the members of the Forty-Third Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to violations of the Pennsylvania Crimes Code and the Controlled Substance, Drug, Device and Cosmetic Act occurring in and around Clearfield County, Pennsylvania pursuant to Notice of Submission of Investigation No. 25, do hereby make the following findings of fact and recommendation of charges:

BACKGROUND

The Grand Jury conducted an investigation into the distribution of methamphetamine in and around Clearfield County by members of a drug organization including Donald Mullens ("Mullens"), Sondra Schmoke-McQuillen ("McQuillen"), Jason Merritts, Joyce Merritts and other co-conspirators, between September 2017 and July 2018.

The Grand Jury learned that in September 2017, Narcotics Agent Delores Morgan ("Agent Morgan") of the Pennsylvania Office of Attorney General Bureau of Narcotics Investigation and Drug Control ("OAG BNIDC") was introduced to a confidential informant ("CI") who wanted to provide information about the distribution of crystal methamphetamine in the Clearfield County area. The information provided by the CI would subsequently be corroborated by law enforcement investigative techniques, including surveillance, as well as other sources of information and testimony presented to this Grand Jury.

With respect to investigative techniques, Pen Registers/Trap & Trace Devices were installed on telephones belonging to several individuals throughout the course of this investigation. This device provides the information transmitted by a telephone when it is used, including the date and time when the communication was initiated or received by the telephone, how long the communication lasted, whether the communication was incoming or outgoing from the telephone,

the "Caller ID" of the telephone number calling or called by the telephone, and, in the case of cellular telephones, the approximate location of the telephone during the communication. Testimony revealed that throughout this investigation, each individual used the telephone and other electronic devices to communicate about the sale and purchase of controlled substances.

From September 2017 through July 2018, law enforcement made several controlled purchases through the use of a CI. The Grand Jury learned that a controlled purchase or controlled buy is a method to buy drugs under the "control" of law enforcement. There are several steps involved in the process. First, the CI is searched before and after the purchase in order to ensure that he/she has no money or drugs on his/her person. If a vehicle is used, it is searched before and after the purchase to ensure that there are no money or drugs inside of it. Next, the CI is provided pre-recorded money to purchase the drugs and is taken to the location where the purchase is to take place, or followed to the location by law enforcement. After the purchase, the CI returns to investigators and surrenders the purchased drugs. Oftentimes, the CI provides a statement as to what took place during the purchase.

In this case, the CI made arrangements to purchase the controlled substances through telephone calls and the use of text messages. Each of the purchases occurred at the residence of Jason and Joyce Merritts, located at Apartment 3G, Lawrence Park Village, 1027 Park Avenue Extension, Clearfield, Clearfield County, except for the controlled buy that occurred on February 16, 2018. That particular purchase occurred in Room 227 of the Super 8 Motel located at 14597 Clearfield Shawville Highway in Clearfield. The chart below summarizes the details of each transaction, including the actual weight of the substances as confirmed by the Pennsylvania State Police Crime Laboratory. Although investigators have not yet received the laboratory results in

connection with the purchases made from February 2018 through July 2018, the Grand Jury was informed that these substances field-tested positive for the presence of methamphetamine.

Date	Individual With Whom Sale Was Arranged	Seller	Price	Quantity Arranged to Purchase/Actual Amount Received
9/29/2017	Jason & Joyce Merritts	Joyce Merritts	\$200	2 grams (1.93 grams)
10/04/2017	Joyce Merritts	Joyce Merritts	\$300	3 grams (.84 grams)
10/27/2017	Jason Merritts	Jason Merritts	\$400	1/8 ounce ¹ (3.45 grams)
11/08/2017	Joyce Merritts	Joyce Merritts	\$400	1/8 ounce (2.99 grams)
12/04/2017	Jason Merritts	Jason Merritts	\$100	½ gram (.48 grams)
12/15/2017	Jason Merritts	Jason Merritts	\$200	1 gram² (1.08 grams)
1/05/2018	Jason Merritis	Jason & Joyce Merritis	\$400	1/8 ounce (3.47 grams)
1/2472018	Jason Merritts	Jason Merritts	\$400	1/8 ounce (4.71 grams)
2/08/2018	Jason Merritts	Jason Merritts	\$400	1/8 ounce
2/16/2018	Jason & Joyce Merritts	Joyce Merritts	\$400	1/8 ounce
3/05/2018	Joyce Merritts	Jason Merritts	\$900	9 grams
3/29/2018	Jason Merritts	Jason Merritts	\$440	1/8 ounce
4/05/2018	Jason Merritts	Jason Merritts	\$1,000	¹ / ₄ ounce ³
4/30/2018	Jason & Joyce Merritts	Jason Merritts	\$1,000	¼ ounce
5/14/2018	Jason Menritts	Jason Merritis	\$1,000	½ ounce

¹ One-eighth of an ounce is also known as an "8 bail" and is approximately 3.5 grams.

² The CI also purchased 10 Ritalin pills (2 grams of Methylphenidate, a Schedule II controlled substance) for \$100.

⁵ One-fourth of an ounce is approximately 7 grams.

Date	Individual With Whom Sale Was Arranged	Seller	Price	Quantity Arranged to Purchase/Actual Amount Received
05/25/2018	Jason & Joyce Merritts	Jason Merritts	\$700	5 grams
06/15/2018	Jason & Joyce Merritts	Jason Merritts	\$900	9 grams
07/06/2018	Jason & Joyce Merritts	Jason Merritts	\$2,000	½ ounce ⁴

Testimony revealed that Jason and Joyce Merritts obtained the methamphetamine they sold to the CI from Mullens and McQuillen. Data from the Pen Registers/Trap & Trace Devices, surveillance and statements made by the Merritts during some of the controlled purchases further connected Mullens and McQuillen to the methamphetamine. For example, testimony established that: 1) On October 12, 2017, Jason Merritts stated that his drug source, a female, would be stopping by the next day to deliver the methamphetamine; 2) On October 13, 2017, in the presence of the CI, Jason Merritts attempted to contact his source via telephone and records established that he was in contact with the cellular telephone belonging to McQuillen; 3) In connection with the October 27, 2017 controlled buy, Jason Merritts obtained the methamphetamine from McQuillen at a residence at 425 South Front Street in Clearfield, 4) Joyce Merritts confirmed during the November 8, 2017 controlled buy that her husband, Jason Merritts, had just returned from a trip to Ohio with his source who obtained an unknown quantity of methamphetamine, and, 5) A few days prior to the December 15, 2017 controlled buy, text messages from McQuillen revealed that her boyfriend/francé, "Donnie" (Mullens), would be traveling and that she would have methamphetamine to sell. The Grand Jury also heard testimony that on January 5, 2018, McOuillen delivered an unknown quantity of methamphetamine to Jason Merritts at his residence,

The weight was described to the Grand Jury as 13 grams. The CI also told investigators that Jason Merritts had an additional ½ ounce of methamphetamine for re-sale.

some of which he then sold to the CI. The Grand Jury learned that on January 24, 2018, while arranging to sell methamphetamine to the CI the next day, Jason Merritts told the CI that he was waiting for McQuillen to return with a quantity of methamphetamine. Additionally, testimony revealed that McQuillen and Mullens continued to have regular contact with the Merritts during several of the remaining controlled purchases and that Jason Merritts travelled to Ohio with them on at least one occasion to obtain more methamphetamine.

The Grand Jury learned that the May 14, 2018 controlled purchase took place after Jason Merritts, the CI, and another individual were observed traveling to meet with Mullens and McQuillen in order to obtain the methamphetamine. Jason Merritts then sold some of this methamphetamine to the CI. During the purchase, the CI was told by Jason Merritts that Mullens and McQuillen were the source of the methamphetamine being sold to the CI. The contact with Mullens continued until his overdose death on May 22, 2018.

The Grand Jury heard testimony that even after the death of Mullens, the Merritts continued to sell methamphetamine and that McQuillen was the source of the drugs. Indeed, the June 15, 2018 controlled buy occurred after the Merritts had telephone contact with McQuillen. On that occasion, the CI drove Jason Merritts to McQuillen's residence at Merritts' direction. Upon arrival, McQuillen provided Jason Merritts with methamphetamine, some of which he sold to the CI upon their return to the Merritts' residence. The final controlled purchase of methamphetamine on July 6, 2018 was arranged with both Joyce and Jason Merritts over the course of several days prior to the actual sale. Testimony before the Grand Jury established that McQuillen was the source of that methamphetamine.

The Grand Jury learned that Mullens and McQuillen obtained their methamphetamine from a source identified as James Thomas ("Thomas") in Akron, Ohio. Text messages received by the

CI confirmed that Mullens and McQuillen were making trips to a location in Akron, Ohio for short periods of time (approximately two hours). Such short trips, based upon the expert testimony of Agent Morgan and OAG BNIDC Narcotics Agent Jonathan Vesnesky, were consistent with these drug dealers obtaining additional quantities of controlled substances for purposes of re-sale.

The testimony before the Grand Jury established that until the time of Mullens' death, Thomas was supplying up to one pound of methamphetamine to McQuillen and/or Mullens whenever they traveled to Ohio to meet with him. Indeed, in April 2018, Mullens was purchasing one pound of methamphetamine from Thomas once or twice per week. Thomas told McQuillen that he charged Mullens \$10,000 per pound of methamphetamine. The Grand Jury learned that McQuillen often travelled to Ohio on Mullens' behalf due to the fact that Mullens was under state supervision.

After Mullens' death, McQuillen restricted her customer base to individuals with whom she had close relationships, such as the Merritts. She continued to travel to Ohio and obtained at least four ounces of methamphetamine from Thomas on every occasion when she met with him. According to telephone records obtained by the Grand Jury, McQuillen traveled to Ohio on approximately 26 occasions in 2018: Three trips in January, four trips in February, four trips in March, five trips in April, two trips in May, four trips in June, and, finally, four trips in July.

Testimony established that on July 28, 2018, law enforcement officers followed McQuillen and another individual to Akron, Ohio where McQuillan met with Thomas and purchased methamphetamine and other drugs for \$3,800. She was observed entering Thomas' home and leaving approximately 30 minutes later. She was followed by law enforcement during her return trip to Clearfield County. Investigators then executed a search warrant on the vehicle in which she was traveling. From the vehicle and/or McQuillen's purse located inside of the vehicle,

investigators seized 1/3 pound of methamphetamine, approximately two 1/8 ounces of cocaine/crack, a small quantity of marijuana, and a quantity of pills suspected to be prescription medications.

Investigators also executed search warrants at the residences of McQuillen and the Merritts. From McQuillen's home, police seized \$10,000, drug paraphernalia, prescription pills and multiple telephones. Investigators recovered controlled substances, paraphernalia, a handgun and a cellular telephone from the Merritts' residence.

The Grand Jury was informed that the Merritts and McQuillen used the proceeds from drug sales to purchase more methamphetamine and other drugs. They also utilized the illegal proceeds to pay for their basic living expenses. As a result, they were able to use multiple vehicles to travel to purchase drugs and utilize their respective residences as distribution points, promoting the ongoing purchase, sale and use of controlled substances. Based upon the expert testimony of Agents Morgan and Vesnesky regarding the behavior and practices of drug dealers, the Grand Jury learned that the consistent actions of the Merritts and McQuillen were undertaken in ways designed to hide the source and ownership of cash used to pay for drugs, the nature of their activities, and the location of sales and purchases of the controlled substances.

RECOMMENDATION OF CHARGES

Based on the evidence we have obtained and considered, which establishes a prima facie case, we, the members of the Forty-Third Statewide Investigating Grand Jury, recommend that the Attorney General, or his designee, institute criminal proceedings against the following individuals and charge them with the listed offenses:

Jason Merritts

Corrupt Organizations, 18 Pa.C.S.§ 911(b)(3),(4);

Violations of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a)(30);

Criminal Conspiracy to commit violations of the Controlled Substance, Drug, Device and Cosmetic Act, 18 Pa.C.S.§ 903(a)(1) - 35 P.S. § 780-113(a)(30);

Dealing in Proceeds of Unlawful Activities, 18 Pa.C.S.§ 5111(a)(1),(2); and

Criminal Use of a Communication Facility, 18 Pa.C.S. § 7512(a)

Joyce Merritts

Corrupt Organizations, 18 Pa.C.S.§ 911(b)(3),(4)

Violations of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a)(30);

Criminal Conspiracy to commit violations of the Controlled Substance, Drug, Device and Cosmetic Act, 18 Pa.C.S.§ 903(a)(1) - 35 P.S. § 780-113(a)(30);

Dealing in Proceeds of Unlawful Activities, 18 Pa.C.S.§ 5111(a)(1),(2); and

Criminal Use of a Communication Facility, 18 Pa.C.S.§ 7512(a)

Sondra Schmoke-McQuillen

Corrupt Organizations, 18 Pa.C.S.§ 911(b)(3),(4);

Violations of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a)(30);

Criminal Conspiracy to commit violations of the Controlled Substance, Drug, Device and Cosmetic Act, 18 Pa.C.S.§ 903(a)(1) - 35 P.S. § 780-113(a)(30);

Dealing in Proceeds of Unlawful Activities, 18 Pa.C.S.§ 5111(a)(1),(2); and

Criminal Use of a Communication Facility, 18 Pa.C.S.§ 7512(a)