

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF LUZERNE

Magisterial District Number: 11-1-03  
MDJ: Hon. Joseph D. Zola  
Address: 615 East Broad Street  
Hazleton, Pa. 18021

Telephone: (570)455-9467



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

ANGEL

LUIS

ESTRADA-TORRES

First Name

Middle Name

Last Name

Ge  
n

30 Payne Street  
Kingston, Pa. 18704

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <b>CR-168-19</b>	Date Filed <b>05/01/2019</b>	OTN/LiveScan Number <b>U704005-1</b>	Complaint/Incident Number <b>BN8001819</b>	Request Lab Services? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <b>4/10/1987</b>	POB	Add'l DOB / /	Co-Defendant(s) <input checked="" type="checkbox"/>
First Name		Middle Name	Last Name	Gen.
AKA				
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.) <b>140</b>
FBI Number	MNU Number			Ft. HEIGHT In. <b>5</b> <b>10</b>
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Fingerprint Classification:			

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	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 to filing. See Pa.R.Crim.P. 507).

SDAG WILLIAM ABRAHAM  
(Name of the attorney for the Commonwealth)

*William Abraham*  
(Signature of the attorney for the Commonwealth)

5/01/2019  
(Date)

I, NAI DARRYL LEDGER/ KEVIN WAGNER      653 / 153  
(Name of the Affiant)      (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General      PA0222400  
(Identify Department or Agency Represented and Political Subdivision)      (Police Agency ORI Number)

do hereby state: (check appropriate box)

1.  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 \_\_\_\_\_

I 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 [301]      Hazleton, Pa  
(Subdivision Code)      (Place/Political Subdivision)

in LUZERNE County      [40]      on or about APRIL 12, 2019 THROUGH MAY 1, 2019  
(County Code)



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-168-19</b>	Date Filed: <b>5/1/19</b>	OTN/LiveScan Number:	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>ANGEL</b>	Middle: <b>LUIS</b>	Last: <b>ESTRADA-TORRES</b>

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. The age of the victim at the time of the offense may be included if known. 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.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>1</b>	<b>911</b>	<b>(b)(3)</b>	<b>of the</b>	<b>TITLE 18</b>	<b>1</b>	<b>F1</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: That the defendant, on or about April 12, 2019 to May 1, 2019 in Luzerne County, Pennsylvania, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly in the conduct of such enterprises affairs through a pattern of racketeering activity as defined in Title 18 Pa. Sec.911(h)(1) To wit: The defendant, while employed by or associating with an enterprise consisting of Joel Tejada Guerra aka "El Menol", Angel Estrada-Torres John Doe aka SD#1, Cristian Tejada Guerra aka SD#3, Hassan Harrell, Richardson Rosario and others both known and unknown, did possess with intent to deliver Fentanyl, a Schedule II controlled substance in violation of Title 18 Pa. Sec. 911 (b)(3)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>2</b>	<b>911</b>	<b>(b)(4)</b>	<b>of the</b>	<b>TITLE 18</b>	<b>1</b>	<b>F1</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: That the Defendant, on or about April 12, 2019 to May 1, 2019, in Luzerne County, Pennsylvania, conspired to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa., pertaining to Corrupt Organizations, that is, during the periods set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with Joel Tejada Guerra aka "El Menol", John Doe aka SD#1, Cristian Tejada Guerra aka SD#3, Hassan Harrell, Richardson Rosario and/or others, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa. C.S. Sec.911(h)(1), in violation of Section 911(B)(4) of the Crimes Code.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>3</b>	<b>780-113</b>	<b>(A)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>1</b>	<b>F</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO POSSESS WITH INTENT TO DELIVER FENTANYL**



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR168-19</b>	Date Filed: <b>5/1/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>ANGEL</b>	Middle: <b>LUIS</b>	Last: <b>ESTRADA-TORRES</b>

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 18, 2019, in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Joel Tejada Guerra aka "EL Menol" and/or John Doe aka SD#1 to PWID 2 bricks weighing approx. less than 1 gram of Fentanyl, a schedule II controlled substance in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>4</b> Offense#	<b>780-113</b> Section	<b>(A)(30)</b> Subsection	<b>of the</b> PA Statute (Title)	<b>1</b> Counts	<b>F</b> Grade	NCIC Offense Code	UCR/NIBRS Code
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<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO POSSESS WITH INTENT TO DELIVER FENTANYL**

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 25, 2019, in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Joel Tejada Guerra aka "EL Menol" and/or John Doe aka SD#4 to PWID Fentanyl, a schedule II controlled substance, weighing approx. less than 1 gram in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>5</b> Offense#	<b>780-113</b> Section	<b>(A)(30)</b> Subsection	<b>of the</b> PA Statute (Title)	<b>2</b> Counts	<b>F</b> Grade	NCIC Offense Code	UCR/NIBRS Code
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<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE (FENTANYL)**

Acts of the accused associated with this Offense: That the Defendant, a person not being authorized by law to manufacture, deliver, or possess with intent to manufacture or deliver the controlled substance set forth herein, on or about April 18, 2019 and April 25, 2019, in Luzerne County, Pennsylvania, did feloniously possess with intent to deliver Fentanyl, a Schedule II controlled substance, in violation of Section 780-113(a)(30). To wit: the above named defendant on or about April 18, 2019 did PWID 2 bricks weighing approx. less than 1 gram of Fentanyl, a schedule II controlled substance and on April 25, 2019 did PWID less than 1 gram of Fentanyl, a schedule II Controlled Substance.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>6</b> Offense#	<b>7512</b> Section	<b>A</b> Subsection	<b>of the</b> PA Statute (Title)	<b>2</b> Counts	<b>F3</b> Grade	NCIC Offense Code	UCR/NIBRS Code
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<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF COMMUNICATIONS FACILITY**

Acts of the accused associated with this Offense: That the Defendant used a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime which constitutes a felony pursuant to Title 18 Pa. C.S.A. 101 et seq. or pursuant to Title 35 P.S. Sec 780-101 et. seq., To wit: the defendant used a telephone to feloniously arrange the delivery of Fentanyl, a Schedule II controlled substance in violation of the Controlled Substance, Drug, Device and Cosmetic Act, on or about April 18, 2019 and April 25, 2019, in Luzerne County, Pennsylvania in violation of 18 PA. C.S.A Section 7512.



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-168-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>ANGEL</b>	Middle: <b>LUIS</b>	Last: <b>ESTRADA-TORRES</b>

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>								

<b>PennDOT Data (if applicable)</b>	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
-------------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>				of the				
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>								

<b>PennDOT Data (if applicable)</b>	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
-------------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>				of the				
--------------------------	--	--	--	--------	--	--	--	--

Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>								

<b>PennDOT Data (if applicable)</b>	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-168-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number: <b>11704005-1</b>	Complaint/Incident Number: <b>BN8001819</b>
Defendant Name:	First: <b>ANGEL</b>	Middle: <b>LUIS</b>	Last: <b>ESTRADA-TORRES</b>

- 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.
- 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.
- This complaint consists of the preceding page(s) numbered 1 through    .
- 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.)**

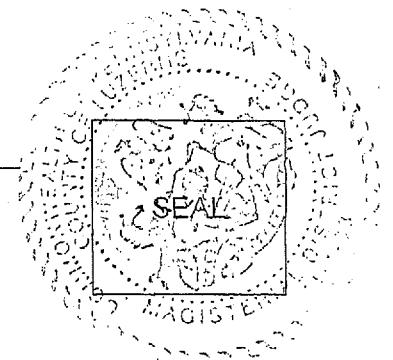
NAFF Angel Luis Estrada  
(Signature of Affiant)

(Date) \_\_\_\_\_ (Year) \_\_\_\_\_  
AND NOW, on this date 5/11/19 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.

011/03  
(Magisterial District Court Number)

[Signature]  
(Issuing Authority)





# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-168-19</i>	Date Filed: <i>5/11/19</i>	OTN/LiveScan Number	Complaint/Incident Number BN8001819
Defendant Name:	First: ANGEL	Middle: LUIS	Last: ESTRADA-TORRES

## AFFIDAVIT of PROBABLE CAUSE

I, NAIL DARRYL LEDGER/ KEVIN WAGNER, 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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

*NAIL Daryl Ledger / Kevin Wagner*

(Signature of Affiant)

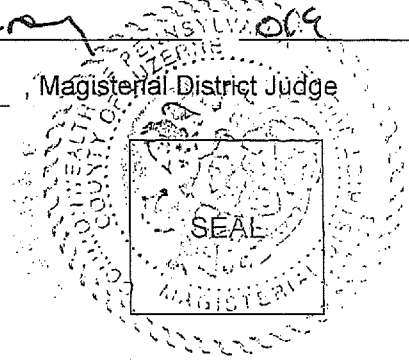
Sworn to me and subscribed before me this 1 day of May

5/11/19 Date

*[Signature]*

Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: LUZERNE



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA

VS.

Magisterial District Number: 11-1-03  
MDJ: Hon. Joseph D. Zola  
Address: 615 E. Broad Street  
Hazleton, Pa 18201

DEFENDANT:

(NAME and ADDRESS):

CRISTIAN

TEJADA GUERRA

First Name

Middle Name

Last Name

643 Lincoln Street  
Hazleton, Pa 18201

Telephone: (570)455-9467

NCIC Extradition Code Type

- 1-Felony Full
- 2-Felony Limited
- 3-Felony Surrounding States
- 4-Felony No Extradition
- 5-Felony Pending Extradition
- 6-Felony Pending Extradition Determ.
- A-Misdemeanor Full
- B-Misdemeanor Limited
- C-Misdemeanor Surrounding States
- D-Misdemeanor No Extradition
- E-Misdemeanor Pending Extradition
- F-Misdemeanor Pending Extradition
- Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CR-166-19 Date Filed: 5/01/2019 OTN/LiveScan Number: U704002-5 Complaint/Incident Number: BN8001819 Request Lab Services?  YES  NO

GENDER:  Male  Female  
 DOB: 09/04/2000 POB: \_\_\_\_\_ Add'l DOB: / / Co-Defendant(s)   
 First Name: \_\_\_\_\_ Middle Name: \_\_\_\_\_ Last Name: \_\_\_\_\_ Gen.: \_\_\_\_\_  
 AKA: SD#3

RACE:  White  Asian  Black  Native American  Unknown  
 ETHNICITY:  Hispanic  Non-Hispanic  Unknown  
 Hair Color:  GRY (Gray)  RED (Red/Aubn.)  SDY (Sandy)  BLU (Blue)  PLE (Purple)  BRO (Brown)  
 BLK (Black)  ONG (Orange)  WHI (White)  XXX (Unk./Bald)  GRN (Green)  PNK (Pink)  
 BLN (Blonde / Strawberry)  
 Eye Color:  BLK (Black)  BLU (Blue)  BRO (Brown)  GRN (Green)  GRY (Gray)  
 HAZ (Hazel)  MAR (Maroon)  PNK (Pink)  MUL (Multicolored)  XXX (Unknown)

DNA:  YES  NO DNA Location: \_\_\_\_\_ WEIGHT (lbs.): \_\_\_\_\_  
 FBI Number: \_\_\_\_\_ MNU Number: \_\_\_\_\_ 180  
 Defendant Fingerprinted:  YES  NO Ft. HEIGHT In. \_\_\_\_\_  
 Fingerprint Classification: \_\_\_\_\_ 5 11

DEFENDANT VEHICLE INFORMATION

Plate #: \_\_\_\_\_ State: \_\_\_\_\_ Haz mat:  Registration: \_\_\_\_\_ Comm'l Veh. Ind.:  School Veh.:  Oth. NCIC Veh. Code: \_\_\_\_\_ Reg. same as Def.:   
 VIN: \_\_\_\_\_ Year: \_\_\_\_\_ 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 to filing. See Pa.R.Crim.P. 507).

SDAG WILLIAM ABRAHAM  
(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

5/01/2019  
(Date)

I, NA II DARRYL LEDGER/DET. SGT. KEVIN WAGNER 654 / 153  
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General PA0222400  
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

1.  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 \_\_\_\_\_

I 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 [301] Hazleton  
(Subdivision Code) (Place-Political Subdivision)

in LUZERNE County [40] on or about JANUARY 28, 2019 THROUGH MAY 01, 2019  
(County Code)



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-166-19</b>	Date Filed: <b>5/1/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>CRISTIAN</b>	Middle:	Last: <b>TEJADA GUERRA</b>

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. The age of the victim at the time of the offense may be included if known. 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.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	--	---

<input checked="" type="checkbox"/>	<b>1</b>	<b>911</b>	<b>(B)(3)</b>	<b>of the</b>	<b>TITLE 18</b>	<b>1</b>	<b>F1</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: That the defendant, on or about January 28, 2019 to May 1, 2019 in Luzerne County, Pennsylvania, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly in the conduct of such enterprises affairs through a pattern of racketeering activity as defined in Title 18 Pa. Sec.911(h)(1) To wit: The defendant, while employed by or associating with an enterprise consisting of Joel Tejada Guerra aka "El Menol", Cristian Tejada Guerra, John Doe aka SD#1, Angel Estrada-Torres, Hassan Harrell, Richardson Rosario and others both known and unknown, did possess with intent to deliver Fentanyl, a Schedule II controlled substance in violation of Title 18 Pa. Sec. 911 (b)(3)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>2</b>	<b>911</b>	<b>(B)(4)</b>	<b>of the</b>	<b>TITLE 18</b>	<b>1</b>	<b>F1</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: That the Defendant, on or about January 28, 2019 to May 1, 2019, in Luzerne County, Pennsylvania, conspired to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa., pertaining to Corrupt Organizations, that is, during the periods set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with Joel Tejada Guerra aka "El Menol", John Doe aka SD#1, Angel Estrada-Torres, Hassan Harrell, Richardson Rosario and/or others, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa. C.S. Sec.911(h)(1), in violation of Section 911(B)(4) of the Crimes Code.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>3</b>	<b>780-113</b>	<b>(A)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>1</b>	<b>F</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO DELIVER FENTANYL**





# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-166-19</b>	Date Filed: <b>5/1/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>CRISTIAN</b>	Middle:	Last: <b>TEJADA GUERRA</b>

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 18, 2019, in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Joel Tejada Guerra aka "EL Menol" to Deliver 1 brick of Fentanyl, a schedule II controlled substance, weighing approx. less than 1 gram in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>4</b>	<b>780-113</b>	<b>(A)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>1</b>	<b>F</b>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DELIVERY OF A CONTROLLED SUBSTANCE**

Acts of the accused associated with this Offense: That the Defendant, a person not being authorized by law to manufacture, deliver, or possess with intent to manufacture or deliver the controlled substance set forth herein, on or about April 18, 2019, in Luzerne County, Pennsylvania, did feloniously deliver Fentanyl, a Schedule II controlled substance, in violation of Section 780-113(a)(30). To wit: the above named defendant on or about April 18, 2019 did deliver 1 brick weighing approx. less than 1 gram of Fentanyl, a schedule II controlled substance.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				<b>of the</b>					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				<b>of the</b>					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-11660-19</u>	Date Filed: <u>5/11/19</u>	OTN/LiveScan Number	Complaint/Incident Number BN8001819
Defendant Name:	First: CRISTIAN	Middle:	Last: TEJADA GUERRA

- 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.
- 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.
- This complaint consists of the preceding page(s) numbered 1 through   .
- 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.)**

(Date)

(Year)

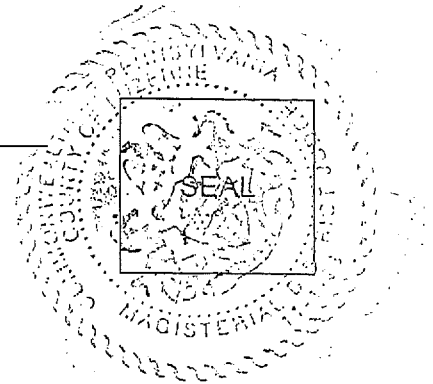
NAIF Dayl S. Johnson  
 (Signature of Affiant)

AND NOW, on this date 5/1/19 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.

11-1-03  
 (Magisterial District Court Number)

[Signature]  
 (Issuing Authority)





# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-16619</u>	Date Filed: <u>5/1/19</u>	OTN/LiveScan Number	Complaint/Incident Number BN8001819
Defendant Name:	First: CRISTIAN	Middle:	Last: TEJADA GUERRA

## AFFIDAVIT of PROBABLE CAUSE

I, NA II DARRYL LEDGER/DET. SGT. KEVIN WAGNER, 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.

NA II Darryl Ledger / Det Sgt Kevin Wagner

(Signature of Affiant)

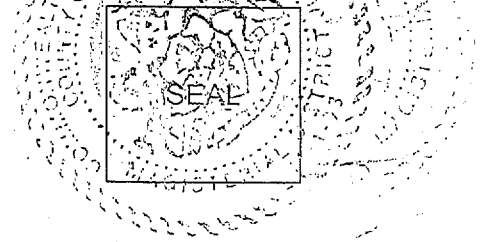
Sworn to me and subscribed before me this 1 day of May

5/1/19

Date

Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA  
 COUNTY OF: LUZERNE  
 Magisterial District Number: 11-1-03  
 MDJ: Hon. Joseph D. Zola  
 Address: 615 East Broad Street  
 Hazleton, Pa. 18201  
 Telephone: (570)455-9467



**POLICE CRIMINAL COMPLAINT**  
 COMMONWEALTH OF PENNSYLVANIA

**VS.**  
**DEFENDANT:** (NAME and ADDRESS):  
**HASSAN** **SHALEEK** **HARRELL**  
 First Name Middle Name Last Name  
 221 South Bennett Court  
 Hazleton, Pa 18201

Ge  
2

**NCIC: Extradition Code Type**

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

**DEFENDANT IDENTIFICATION INFORMATION**

Docket Number <b>CR-164-19</b>	Date Filed <b>5/01/2019</b>	OTN/LiveScan Number <b>U703999-2</b>	Complaint/Incident Number <b>BN8001819</b>	Request Lab Services? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <b>06/14/1991</b>	POB	Add'l DOB / /	Co-Defendant(s) <input checked="" type="checkbox"/>
	First Name	Middle Name	Last Name	Gen.
	AKA			
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> WHI (White) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green)	<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon)	<input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) <b>160</b>		
FBI Number	MNU Number	Ft. HEIGHT In. <b>6</b> <b>1</b>		
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Fingerprint Classification:			

**DEFENDANT VEHICLE INFORMATION**

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	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 to filing. See Pa.R.Crim.P. 507).

SDAG WILLIAM ABRAHAM  
 (Name of the attorney for the Commonwealth)

*William Abraham*  
 (Signature of the attorney for the Commonwealth)

**5/01/2019**  
 (Date)

I, <b>NAII DARRYL LEDGER/SGT KEVIN WAGNER</b> (Name of the Affiant)	<b>654/153</b> (PSP/MPOETC - Assigned Affiant ID Number & Badge #)
of <b>Pennsylvania Office of Attorney General</b> (Identify Department or Agency Represented and Political Subdivision)	<b>PA0222400</b> (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above <input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I 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 [301] Hazleton, Pa (Subdivision Code) (Place-Political Subdivision)	
in LUZERNE County [40] (County Code)	on or about <b>APRIL 12, 2019 THROUGH MAY 1, 2019</b>



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-164-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number <b>U703999-2</b>	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>HASSAN</b>	Middle: <b>SHALEEK</b>	Last: <b>HARRELL</b>

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. The age of the victim at the time of the offense may be included if known. 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.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>1</b>	<b>911</b>	<b>(B)(3)</b>	<b>of the</b>	<b>TITLE 18</b>	<b>1</b>	<b>F1</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: That the defendant, on or about April 12, 2019 to May 1, 2019 in Luzerne County, Pennsylvania, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly in the conduct of such enterprises affairs through a pattern of racketeering activity as defined in Title 18 Pa. Sec.911(h)(1) To wit: The defendant, while employed by or associating with an enterprise consisting of Joel Tejada Guerra aka "El Menol", Hassan Harrell, John Doe aka SD#1, Cristian Tejada Guerra aka SD#3, Angel Estrada-Torres, Richardson Rosario and others both known and unknown, did possess with intent to deliver Fentanyl, a Schedule II controlled substance in violation of Title 18 Pa. Sec. 911 (b)(3)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>2</b>	<b>911</b>	<b>(B)(4)</b>	<b>of the</b>	<b>TITLE 18</b>	<b>1</b>	<b>F1</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: That the Defendant, on or about April 12, 2019 to May 1, 2019, in Luzerne County, Pennsylvania, conspired to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa., pertaining to Corrupt Organizations, that is, during the periods set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with Joel Tejada Guerra aka "El Menol", John Doe aka SD#1, Cristian Tejada Guerra aka SD#3, and/or others, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa. C.S. Sec.911(h)(1), in violation of Section 911(b)(4) of the Crimes Code.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>3</b>	<b>780-113</b>	<b>(a)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>2</b>	<b>F</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO POSSESS WITH INTENT TO DELIVER FENTANYL**



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-164-19</b>	Date Filed: <b>5/1/19</b>	OTN/LiveScan Number <b>U1703999-2</b>	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>HASSAN</b>	Middle: <b>SHALEEK</b>	Last: <b>HARRELL</b>

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 17, 2019 and April 26, 2019, in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Joel Tejada Guerra aka "EL Menol" and/or others on April 17, 2019 to PWID 50 bricks weighing approx. 25 grams of Fentanyl, a schedule II controlled substance and on April 26, 2019 to PWID approx. 35 bricks weighing approx. 17 grams of Fentanyl, a schedule II controlled substance in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>4</b> Offense#	<b>780-113</b> Section	<b>(A)(30)</b> Subsection	<b>of the</b>	<b>TITLE 35</b> PA Statute (Title)	<b>1</b> Counts	<b>F</b> Grade	NCIC Offense Code	UCR/NIBRS Code
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<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE (FENTANYL)**

Acts of the accused associated with this Offense: That the Defendant, a person not being authorized by law to manufacture, deliver, or possess with intent to manufacture or deliver the controlled substance set forth herein, on or about April 26, 2019, in Luzerne County, Pennsylvania, did feloniously possess with intent to deliver Fentanyl, a Schedule II controlled substance, in violation of Section 780-113(a)(30). To wit: the above named defendant on or about April 26, 2019 did PWID approx. 35 bricks weighing approx. 17.5 grams of Fentanyl, a schedule II controlled substance.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>5</b> Offense#	<b>7512</b> Section	<b>A</b> Subsection	<b>of the</b>	<b>TITLE 18</b> PA Statute (Title)	<b>3</b> Counts	<b>F3</b> Grade	NCIC Offense Code	UCR/NIBRS Code
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<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF COMMUNICATIONS FACILITY**

Acts of the accused associated with this Offense: That the Defendant used a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime which constitutes a felony pursuant to Title 18 Pa. C.S.A. 101 et seq. or pursuant to Title 35 P.S. Sec 780-101 et. seq., To wit: the defendant used a telephone to feloniously arrange the delivery of Fentanyl, a Schedule II controlled substance in violation of the Controlled Substance, Drug, Device and Cosmetic Act, on or about April 17, 2019 and April 26, 2019, and May 1, 2019 in Luzerne County, Pennsylvania in violation of 18 PA. C.S.A Section 7512.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>6</b> Offense#	<b>780-113</b> Section	<b>(A)(30)</b> Subsection	<b>of the</b>	<b>TITLE 35</b> PA Statute (Title)	<b>1</b> Counts	<b>F</b> Grade	NCIC Offense Code	UCR/NIBRS Code
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<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO POSSESS WITH INTENT TO DELIVER FENTANYL**

Acts of the accused associated with this Offense: In that the above named Defendant did on or about May 1, 2019, in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Joel Tejada Guerra aka "EL Menol" on May 1, 2019 to PWID 25 bricks weighing approx. 12.5 grams of Fentanyl, a schedule II controlled substance in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-164-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number <b>U703999-2</b>	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>HASSAN</b>	Middle: <b>SHALEEK</b>	Last: <b>HARRELL</b>

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <small>18 901 A</small>	<input type="checkbox"/> Solicitation <small>18 902 A</small>	<input type="checkbox"/> Conspiracy <small>18 903</small>	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	7	780-113	(A)(30)	of the	TITLE 35	1	F		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE (FENTANYL)**

Acts of the accused associated with this Offense: That the Defendant, a person not being authorized by law to manufacture, deliver, or possess with intent to manufacture or deliver the controlled substance set forth herein, on or about May 1, 2019, in Luzerne County, Pennsylvania, did feloniously possess with intent to deliver Fentanyl, a Schedule II controlled substance, in violation of Section 780-113(a)(30). To wit: the above named defendant on or about May 1, 2019 did PWID approx. 25 bricks weighing approx. 12.5 grams of Fentanyl, a schedule II controlled substance.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <small>18 901 A</small>	<input type="checkbox"/> Solicitation <small>18 902 A</small>	<input type="checkbox"/> Conspiracy <small>18 903</small>	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <small>18 901 A</small>	<input type="checkbox"/> Solicitation <small>18 902 A</small>	<input type="checkbox"/> Conspiracy <small>18 903</small>	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-164-19</u>	Date Filed: <u>5/1/19</u>	OTN/LiveScan Number <u>U703999-2</u>	Complaint/Incident Number BN8001819
Defendant Name:	First: HASSAN	Middle: SHALEEK	Last: HARRELL

- 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.
- 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.
- This complaint consists of the preceding page(s) numbered 1 through    .
- 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.)**

(Date)

(Year)

AND NOW, on this date

May 1, 2019

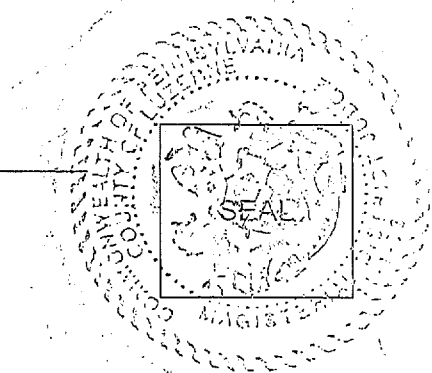
I certify that the complaint has been properly completed and verified.

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

NATF Dayl Leda / NATF  
(Signature of Affiant)

11-1-03  
(Magisterial District Court Number)

[Signature]  
(Issuing Authority)







# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN8001819
Defendant Name:	First: HASSAN	Middle: SHALEEK	Last: HARRELL

## AFFIDAVIT of PROBABLE CAUSE

I, NAFI DARRYL LEDGER/SGT KEVIN WAGNER, 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.

*NAFI Darryl Ledger / Des S...*

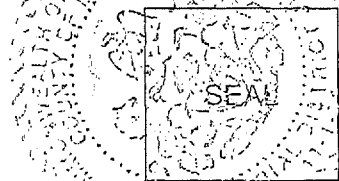
(Signature of Affiant)

Sworn to me and subscribed before me this 1 day of May 2019

\_\_\_\_\_ Date \_\_\_\_\_

Magisterial-District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: LUZERNE

Magisterial District Number: 11-1-03  
MDJ: Hon. Joseph D. Zola  
Address: 615 E. Broad Street  
Hazleton, Pa 18201

Telephone: (570)455-9467



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

JOEL

TEJADA GUERRA

First Name

Middle Name

Last Name

643 Lincoln Street  
Hazleton, Pa 18201

Ge  
n

NCIC Extradition Code Type

- |  |   |  |  |
|--|---|--|--|
| <input checked="" type="checkbox"/> 1-Felony Full    | <input type="checkbox"/> 5-Felony Pending Extradition         | <input type="checkbox"/> C-Misdemeanor Surrounding States  | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited            | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition      |  |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full                   | <input type="checkbox"/> E-Misdemeanor Pending Extradition |  |
| <input type="checkbox"/> 4-Felony No Extradition     | <input type="checkbox"/> B-Misdemeanor Limited                | <input type="checkbox"/> F-Misdemeanor Pending Extradition |  |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR-169-19</u>	Date Filed <u>5/01/2019</u>	OTN/LiveScan Number <u>U704006-2</u>	Complaint/Incident Number <u>BN8001819</u>	Request Lab Services? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
-----------------------------------	--------------------------------	---	---	--

GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>11/21/1990</u>	POB	Add'l DOB / /	Co-Defendant(s) <input checked="" type="checkbox"/>
First Name	Middle Name	Last Name	Gen.	
AKA <u>EL MENOL</u>				

RACE  White  Asian  Black  Native American  Unknown

ETHNICITY  Hispanic  Non-Hispanic  Unknown

Hair Color  
 GRY (Gray)  RED (Red/Aubn.)  SDY (Sandy)  BLU (Blue)  PLE (Purple)  BRO (Brown)  
 BLK (Black)  ONG (Orange)  WHI (White)  XXX (Unk./Bald)  GRN (Green)  PNK (Pink)  
 BLN (Blonde / Strawberry)

Eye Color  
 BLK (Black)  BLU (Blue)  BRO (Brown)  GRN (Green)  GRY (Gray)  
 HAZ (Hazel)  MAR (Maroon)  PNK (Pink)  MUL (Multicolored)  XXX (Unknown)

DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.)
FBI Number	MNU Number	<u>140</u>

Defendant Fingerprinted  YES  NO

Fingerprint Classification: \_\_\_\_\_

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	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 to filing. See Pa.R.Crim.P. 507).

SDAG WILLIAM ABRAHAM

(Name of the attorney for the Commonwealth)

*William Abraham*  
(Signature of the attorney for the Commonwealth)

5/01/2019

(Date)

I, NA II DARRYL LEDGER/DET. SGT. KEVIN WAGNER 654 / 153  
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General PA0222400  
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

1.  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 \_\_\_\_\_

I 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 [301] Hazleton  
(Subdivision Code) (Place-Political Subdivision)

in LUZERNE County

[40]

(County Code)

on or about JANUARY 28, 2019 THROUGH MAY 01, 2019



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR169-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number	Complaint/Incident Number BN8001819
Defendant Name:	First: JOEL	Middle:	Last: TEJADA GUERRA

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. The age of the victim at the time of the offense may be included if known. 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.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	911	(B)(2)	of the	TITLE 18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: The Defendant, on or about January 28, 2019 through May 1, 2019, in Luzerne County, Pennsylvania, through a pattern of racketeering activity did acquire and maintain, directly or indirectly, any interest in or control of any enterprise. To wit: The Defendant did maintain an interest and control of a corrupt organization through a pattern of racketeering activity as defined under Title 18 Pa. 911(B)(1)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	911	(B)(4)	of the	TITLE 18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: That the Defendant, on or about January 28, 2019 to May 1, 2019, in Luzerne County, Pennsylvania, conspired to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa., pertaining to Corrupt Organizations, that is, during the periods set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with John Doe aka SD#1, Cristian Tejada Guerra aka SD#3, Hassan Harrell, Angel Estrada-Torres, Richardson Rosario, John Doe SD#4 and/or others, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa. C.S. Sec.911(h)(1), in violation of Section 911(B)(4) of the Crimes Code.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	780-113	(A)(30)	of the	TITLE 35	2	F		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO DELIVER FENTANYL**



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-169-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>JOEL</b>	Middle:	Last: <b>TEJADA GUERRA</b>

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 12, 2019 and April 14, 2019 in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Richardson Rosario and/or John Doe aka SD#1 on April 12 to deliver 15 bricks weighing approx. 7.5 grams of Fentanyl, a schedule II controlled substance, on April 14 to deliver 20 bricks weighing approx. 10 grams of Fentanyl, a schedule II controlled substance in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>4</b>	<b>780-113</b>	<b>(A)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>2</b>	<b>F</b>		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO DELIVER FENTANYL**

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 18, 2019 and April 28, 2019 in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Richardson Rosario and/or Cristian Tejada Guerra aka SD#3 on April 18 to deliver 1 brick weighing approx. less than 1 gram of Fentanyl, a schedule II controlled substance, on April 28, 2019 did conspire with Richardson and/or John Doe SD#4 to deliver 20 bricks weighing approx. 10 grams of Fentanyl, a schedule II controlled substance in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>5</b>	<b>780-113</b>	<b>(A)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>2</b>	<b>F</b>		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO DELIVER FENTANYL**

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 18, 2019 and April 25, 2019 in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Angel Estrada-Torres and/or John Doe aka SD#1 on April 18 to deliver 2 bricks weighing approx. 1 gram of Fentanyl, a schedule II controlled substance, on April 25, 2019 did conspire with Angel Estrada-Torres and/or John Doe SD#4 to deliver Fentanyl, a schedule II controlled substance, weighing approx. less than 1 gram in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>6</b>	<b>780-113</b>	<b>A(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>2</b>	<b>F</b>		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO DELIVER FENTANYL**

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 17, 2019 and April 26, 2019, in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Hassan Harrell and/or others on April 17, 2019 to deliver 50 bricks weighing approx. 25 grams of Fentanyl, a schedule II controlled substance and on April 26, 2019 to deliver approx. 35 bricks weighing approx. 17 grams of Fentanyl, a schedule II controlled substance in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-169-19</b>	Date Filed: <b>5/1/19</b>	OTN/LiveScan Number <b>U704006-2</b>	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>JOEL</b>	Middle:	Last: <b>TEJADA GUERRA</b>

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>7</b> Offense#	<b>7512</b> Section	<b>A</b> Subsection	<b>of the</b> PA Statute (Title)	<b>TITLE 18</b>	<b>9</b> Counts	<b>F3</b> Grade	NCIC Offense Code	UCR/NIBRS Code
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<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF COMMUNICATIONS FACILITY**

Acts of the accused associated with this Offense: That the Defendant used a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime which constitutes a felony pursuant to Title 18 Pa. C.S.A. 101 et seq. or pursuant to Title 35 P.S. Sec 780-101 et. seq., To wit: the defendant used a telephone to feloniously arrange the delivery of Fentanyl, a Schedule II controlled substance in violation of the Controlled Substance, Drug, Device and Cosmetic Act, on or about January 28, 2019 through May 1, 2019, in Luzerne County, Pennsylvania in violation of 18 PA. C.S.A Section 7512.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	<b>8</b> Offense#	<b>780-113</b> Section	<b>(A)(30)</b> Subsection	<b>of the</b> PA Statute (Title)	<b>TITLE 35</b>	<b>1</b> Counts	<b>F</b> Grade	NCIC Offense Code	UCR/NIBRS Code
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<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DELIVERY OF A CONTROLLED SUBSTANCE**

Acts of the accused associated with this Offense: That the Defendant, a person not being authorized by law to manufacture, deliver, or possess with intent to manufacture or deliver the controlled substance set forth herein, on or about May 1, 2019, in Luzerne County, Pennsylvania, did feloniously deliver Fentanyl, a Schedule II controlled substance, in violation of Section 780-113(a)(30). To wit: the above named defendant on or about May 1, 2019 did deliver 25 bricks weighing approx. 12.5 grams of Fentanyl, a schedule II controlled substance.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	---	---

<input type="checkbox"/> Lead?	<b>9</b> Offense#	<b>780-113</b> Section	<b>(A)(30)</b> Subsection	<b>of the</b> PA Statute (Title)	<b>TITLE 35</b>	<b>1</b> Counts	<b>F</b> Grade	NCIC Offense Code	UCR/NIBRS Code
--------------------------------	-------------------	------------------------	---------------------------	----------------------------------	-----------------	-----------------	----------------	-------------------	----------------

<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO DELIVER FENTANYL**

Acts of the accused associated with this Offense: In that the above named Defendant did on or about May 1, 2019, in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Hassan Harrell and others to Deliver 25 bricks of Fentanyl, a schedule II controlled substance, weighing approx. 12.5 grams in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-169-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>JOEL</b>	Middle:	Last: <b>TEJADA GUERRA</b>

- 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.
- 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.
- This complaint consists of the preceding page(s) numbered 1 through    .
- 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.

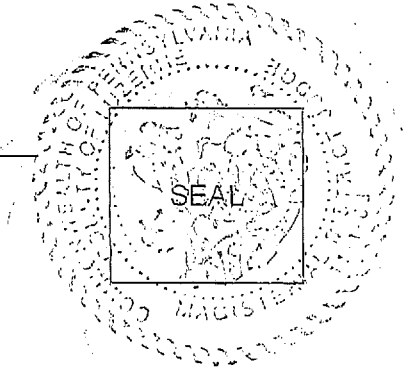
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.  
**(Before a warrant of arrest can be issued, an affidavit of probable cause must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

NAFF Doyle Lally / D.S.M.  
 (Signature of Affiant)

(Date) \_\_\_\_\_ (Year) \_\_\_\_\_  
 AND NOW, on this date 5/11/19 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.

117-03  
 (Magisterial District Court Number)

[Signature]  
 (Issuing Authority)





**POLICE CRIMINAL COMPLAINT**

Docket Number: <u>CR16979</u>	Date Filed: <u>5/11/19</u>	OTN/LiveScan Number	Complaint/Incident Number BN8001819
Defendant Name:	First: JOEL	Middle:	Last: TEJADA GUERRA

**AFFIDAVIT of PROBABLE CAUSE**

I, NA II DARRYL LEDGER/DET. SGT. KEVIN WAGNER, 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.

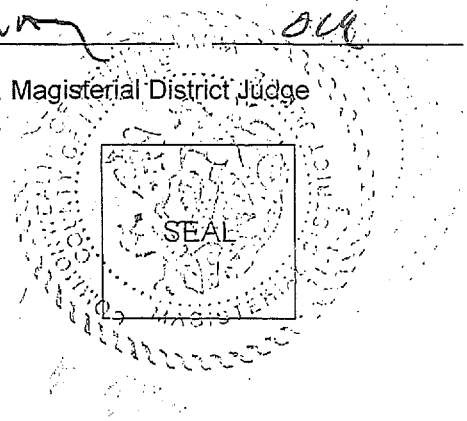
NA II Darryl Ledger / Det SGT

(Signature of Affiant)

Sworn to me and subscribed before me this 1 day of May 2019  
5/11/19 Date \_\_\_\_\_, Magisterial District Judge

My commission expires first Monday of January,

[Signature]



COMMONWEALTH OF PENNSYLVANIA  
 COUNTY OF: LUZERENE  
 Magisterial District Number: 11-1-03  
 MDJ: Hon. Joseph D. Zola  
 Address: 615 E. Broad Street  
 Hazleton, Pa 18201  
 Telephone: (570)455-9467



**POLICE CRIMINAL COMPLAINT**  
**COMMONWEALTH OF PENNSYLVANIA**  
**VS.**

DEFENDANT: (NAME and ADDRESS):  
 JOHN DOE  
 First Name Middle Name Last Name  
 26 East 1st Street Apt 3(2nd floor East)  
 Hazleton, Pa 18201

Ge  
2

NCIC Extradition Code Type			
<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION					
Docket Number <u>CR-165-19</u>	Date Filed <u>5/01/2019</u>	OTN/LiveScan Number <u>U704000-3</u>	Complaint/Incident Number <u>BN8001819</u>	Request Lab Services? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>/ /</u>	POB	Add'l DOB <u>/ /</u>	Co-Defendant(s) <input checked="" type="checkbox"/>	
	First Name	Middle Name	Last Name	Gen.	
	AKA <u>SD#1</u>				
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)	Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)				
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.) <u>150</u>	
FBI Number	MNU Number			Ft. HEIGHT In. <u>5</u> <u>10</u>	
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Fingerprint Classification:				

DEFENDANT VEHICLE INFORMATION							
Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	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 to filing. See Pa.R.Crim.P. 507).

SDAG WILLIAM ABRAHAM \_\_\_\_\_ 5/01/2019  
 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, <u>NA II DARRYL LEDGER/DET. SGT. KEVIN WAGNER</u> <u>654/153</u> (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of <u>Pennsylvania Office of Attorney General</u> <u>PA0222400</u> (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)
do hereby state: (check appropriate box)
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above <input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____
<input type="checkbox"/> I 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 [301] <u>Hazleton</u> (Subdivision Code) (Place-Political Subdivision)
in LUZERENE County [40] _____ on or about JANUARY 28, 2019 THROUGH MAY 01, 2019 (County Code)





# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-10519</b>	Date Filed: <b>5/1/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>JOHN</b>	Middle:	Last: <b>DOE</b>

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. The age of the victim at the time of the offense may be included if known. 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.)

<b>Inchoate Offense</b>	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	911	(B)(3)	of the	TITLE 18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
-------------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense: That the defendant, on or about January 28, 2019 to May 1, 2019 in Luzerne County, Pennsylvania, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly in the conduct of such enterprises affairs through a pattern of racketeering activity as defined in Title 18 Pa. Sec.911(h)(1) To wit: The defendant, while employed by or associating with an enterprise consisting of Joel Tejada Guerra aka "El Menol", John Doe aka SD#1, Cristian Tejada Guerra aka SD#3, Hassan Harrell, Angel Estrada-Torres, Richardson Rosario and others both known and unknown, did possess with intent to deliver Fentanyl, a Schedule II controlled substance in violation of Title 18 Pa. Sec. 911 (b)(3)

<b>Inchoate Offense</b>	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	911	(B)(4)	of the	TITLE 18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
-------------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense: That the Defendant, on or about January 28, 2019 to May 1, 2019, in Luzerne County, Pennsylvania, conspired to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa., pertaining to Corrupt Organizations, that is, during the periods set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with Joel Tejada Guerra aka "El Menol", Cristian Tejada Guerra aka SD#3, Hassan Harrell, Angel Estrada-Torres, Richardson Rosario and/or others, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa. C.S. Sec.911(h)(1), in violation of Section 911(B)(4) of the Crimes Code.

<b>Inchoate Offense</b>	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	780-113	(A)(30)	of the	TITLE 35	3	F		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CONSPIRACY TO DELIVER A CONTROLLED SUBSTANCE**



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-165-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>JOHN</b>	Middle:	Last: <b>DOE</b>

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 12, 2019, April 14, 2019, April 18, 2019 in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Joel Tejada Guerra aka "EL Menol" and/or Richardson Rosario on April 12 to Deliver 15 bricks weighing approx. 7.5 grams of Fentanyl, a schedule II controlled substance, on April 14 to Deliver 20 bricks weighing approx. 10 grams of Fentanyl, a schedule II controlled substance and on April 18 conspired with Joel Tejada Guerra and Angel Estrada-Torres to deliver 2 bricks weighing approx: 1 gram of Fentanyl, a schedule II controlled substance in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>4</b>	<b>780-113</b>	<b>(A)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>3</b>	<b>F</b>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **DELIVERY OF A CONTROLLED SUBSTANCE**

Acts of the accused associated with this Offense: That the Defendant, a person not being authorized by law to manufacture, deliver, or possess with intent to manufacture or deliver the controlled substance set forth herein, on or about April 12, 2019, April 14, 2019 and April 18, 2019 in Luzerne County, Pennsylvania, did feloniously deliver Fentanyl, a Schedule II controlled substance, in violation of Section 780-113(a)(30). To wit: the above named defendant on or about April 12, 2019 did deliver 15 bricks weighing approx. 7.5 grams of Fentanyl, a schedule II controlled substance on April 14, 2019 did deliver 20 bricks weighing approx. 10 grams of Fentanyl, a schedule II controlled substance, on April 18, 2019 did deliver 2 bricks weighing approx. 1 grams of Fentanyl, a schedule II controlled substance.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>5</b>	<b>7512</b>	<b>A</b>	<b>of the</b>	<b>TITLE 18</b>	<b>3</b>	<b>F3</b>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF A COMMUNICATION FACILITY**

Acts of the accused associated with this Offense: That the Defendant used a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime which constitutes a felony pursuant to Title 18 Pa. C.S.A. 101 et seq. or pursuant to Title 35 P.S. Sec 780-101 et. seq., To wit: the defendant used a telephone to feloniously arrange the delivery of Fentanyl, a Schedule II controlled substance in violation of the Controlled Substance, Drug, Device and Cosmetic Act, on or about April 12, 2019, April 14, 2019 and April 18, 2019 in Luzerne County, Pennsylvania in violation of 18 PA. C.S.A Section 7512.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>				<b>of the</b>					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense:



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-105-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number		Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>JOHN</b>	Middle:	Last: <b>DOE</b>	

- 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.
- 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.
- This complaint consists of the preceding page(s) numbered 1 through    .
- 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.)**

(Date)

(Year)

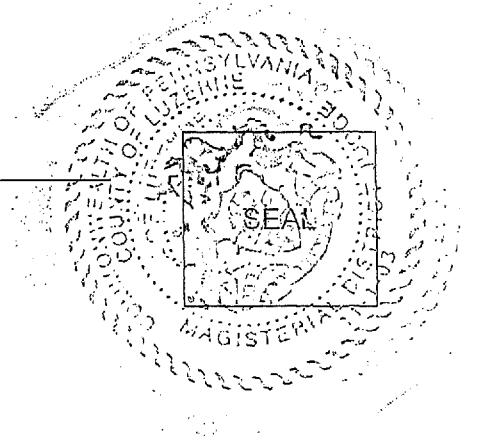
NAFI Dayl Lely / D. J. M.  
 (Signature of Affiant)

AND NOW, on this date 5/11/19 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.

167-03  
 (Magisterial District Court Number)

[Signature]  
 (Issuing Authority)





# POLICE CRIMINAL COMPLAINT

Docket Number: CR-10519	Date Filed: 5/11/19	OTN/LiveScan Number	Complaint/Incident Number BN8001819
Defendant Name:	First: JOHN	Middle:	Last: DOE

## AFFIDAVIT of PROBABLE CAUSE

I, NA II DARRYL LEDGER/DET. SGT. KEVIN WAGNER, 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.

NAII Darryl Ledger / Det Sgt Kevin Wagner

(Signature of Affiant)

Sworn to me and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_

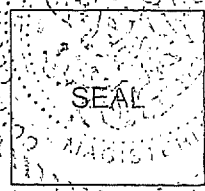
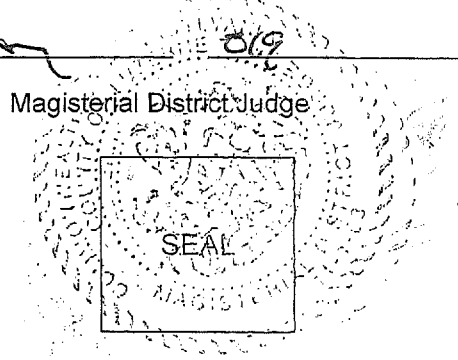
5/11/19

Date

[Signature]

, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: LUZERENE



**POLICE CRIMINAL COMPLAINT**  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 11-1-03  
MDJ: Hon. Joseph D. Zola  
Address: 615 E. Broad Street  
Hazleton, Pa 18201  
  
Telephone: (570)455-9467

DEFENDANT: (NAME and ADDRESS):  
RICHARDSON JAVIER ROSARIO  
First Name Middle Name Last Name  
  
337 Muir Avenue  
Hazleton, Pa 18201

Ge  
n

**NCIC Extradition Code Type**

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

**DEFENDANT IDENTIFICATION INFORMATION**

Docket Number <u>CR167-19</u>	Date Filed <u>5/01/2019</u>	OTN/LiveScan Number <u>U704004-0</u>	Complaint/Incident Number <u>BN8001819</u>	Request Lab Services? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>07/04/1998</u>	POB	Add'l DOB / /	Co-Defendant(s) <input checked="" type="checkbox"/>
First Name <u>AKA RICHARZON</u>	Middle Name	Last Name <u>ROSARIO</u>	Gen.	
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> WHI (White) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRN (Brown) <input type="checkbox"/> WHI (White) <input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green)	<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon)	<input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)	

DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) <u>105</u>
FBI Number	MNU Number	Ft. HEIGHT In. <u>5</u> <u>6</u>
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
Fingerprint Classification:		

**DEFENDANT VEHICLE INFORMATION**

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	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 to filing. See Pa.R.Crim.P. 507).

SDAG WILLIAM ABRAHAM  
(Name of the attorney for the Commonwealth)

*William Abraham*  
(Signature of the attorney for the Commonwealth)

5/01/2019  
(Date)

I, NA II DARRYL LEDGER/DET. SGT. KEVIN WAGNER 654 / 153  
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General PA0222400  
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

1.  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 \_\_\_\_\_

I 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 [301] Hazleton  
(Subdivision Code) (Place-Political Subdivision)

in LUZERENE County [40] on or about JANUARY 28, 2019 THROUGH MAY 1, 2019  
(County Code)



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-167-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>RICHARDSON</b>	Middle: <b>JAVIER</b>	Last: <b>ROSARIO</b>

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. The age of the victim at the time of the offense may be included if known. 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.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	--	---	---	---

<input checked="" type="checkbox"/>	<b>1</b>	<b>911</b>	<b>(B)(3)</b>	<b>of the</b>	<b>TITLE 18</b>	<b>1</b>	<b>F1</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: That the defendant, on or about January 28, 2019 to May 1, 2019 in Luzerne County, Pennsylvania, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly in the conduct of such enterprises affairs through a pattern of racketeering activity as defined in Title 18 Pa. Sec.911(h)(1) To wit: The defendant, while employed by or associating with an enterprise consisting of Joel Tejada Guerra aka "El Menol", Richardson Rosario, John Doe aka SD#1, Cristian Tejada Guerra aka SD#3, Hassan Harrell, Angel Estrada-Torres and others both known and unknown, did possess with intent to deliver Fentanyl, a Schedule II controlled substance in violation of Title 18 Pa. Sec. 911 (b)(3)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>	<b>2</b>	<b>911</b>	<b>(B)(4)</b>	<b>of the</b>	<b>TITLE 18</b>	<b>1</b>	<b>F1</b>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense: That the Defendant, on or about January 28, 2019 to May 1, 2019, in Luzerne County, Pennsylvania, conspired to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa., pertaining to Corrupt Organizations, that is, during the periods set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with Joel Tejada Guerra aka "El Menol", John Doe aka SD#1, Cristian Tejada Guerra aka SD#3, Hassan Harrell, Angel Estrada-Torres and/or others, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa. C.S. Sec.911(h)(1), in violation of Section 911(B)(4) of the Crimes Code.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>3</b>	<b>780-113</b>	<b>(A)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>3</b>	<b>F</b>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO POSSESS WITH INTENT TO DELIVER FENTANYL**



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-167-19</b>	Date Filed: <b>5/11/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>BN8001819</b>
Defendant Name:	First: <b>RICHARDSON</b>	Middle: <b>JAVIER</b>	Last: <b>ROSARIO</b>

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 12, 2019, April 14, 2019, April 18, 2019 in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Joel Tejada Guerra aka "EL Menol" and/or John Doe aka SD#1 on April 12 to PWID 15 bricks weighing approx. 7.5 grams of Fentanyl, a schedule II controlled substance, on April 14 to PWID 20 bricks weighing approx. 10 grams of Fentanyl, a schedule II controlled substance and on April 18 to PWID 5 bricks weighing approx: 2.5 grams of Fentanyl, a schedule II controlled substance in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<b>Inchoate Offense</b>	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>4</b>	<b>780-113</b>	<b>(a)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>1</b>	<b>F</b>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO POSSESS WITH INTENT TO DELIVER FENTANYL**

Acts of the accused associated with this Offense: In that the above named Defendant did on or about April 28, 2019 in Luzerne County, Pennsylvania conspire with another person(s) to commit a crime with the intent of promoting or facilitation its commission agreed with such other person(s) that they or one or more of them will engage in such conduct which constitutes such crime. To wit: The Defendant did conspire and agree with Joel Tejada Guerra aka "EL Menol" and/or John Doe aka SD#4 on April 28 to PWID 20 bricks weighing approx. 10 grams of Fentanyl, a schedule II controlled substance in violation of Section 780-113(a)(30) and Title 18 C.S. Sec. 903

<b>Inchoate Offense</b>	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>5</b>	<b>780-113</b>	<b>(A)(30)</b>	<b>of the</b>	<b>TITLE 35</b>	<b>4</b>	<b>F</b>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE (FENTANYL)**

Acts of the accused associated with this Offense: That the Defendant, a person not being authorized by law to manufacture, deliver, or possess with intent to manufacture or deliver the controlled substance set forth herein, on or about April 12, 2019, April 14, 2019, April 18, 2019 and April 28, 2019, in Luzerne County, Pennsylvania, did feloniously possess with intent to deliver Fentanyl, a Schedule II controlled substance, in violation of Section 780-113(a)(30). To wit: the above named defendant on or about April 12, 2019 did PWID 15 bricks weighing approx. 7.5 grams of Fentanyl, a schedule II controlled substance on April 14, 2019 did PWID 20 bricks weighing approx. 10 grams of Fentanyl, a schedule II controlled substance, on April 18, 2019 did PWID 5 bricks weighing approx. 2.5 grams of Fentanyl, a schedule II controlled substance and on April 28, 2019 did PWID 20 bricks weighing approx. 10 grams of Fentanyl, a schedule II controlled substance.

<b>Inchoate Offense</b>	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<b>6</b>	<b>7512</b>	<b>A</b>	<b>of the</b>	<b>TITLE 18</b>	<b>4</b>	<b>F3</b>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF COMMUNICATIONS FACILITY**

Acts of the accused associated with this Offense: That the Defendant used a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime which constitutes a felony pursuant to Title 18 Pa. C.S.A. 101 et seq. or pursuant to Title 35 P.S. Sec 780-101 et. seq., To wit: the defendant used a telephone to feloniously arrange the delivery of Fentanyl, a Schedule II controlled substance in violation of the Controlled Substance, Drug, Device and Cosmetic Act, on or about April 12, 2019, April 14, 2019, April 18, 2019 and April 28, 2019, in Luzerne County, Pennsylvania in violation of 18 PA. C.S.A Section 7512.



# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-167-19</u>	Date Filed: <u>5/11/19</u>	OTN/LiveScan Number	Complaint/Incident Number BN8001819
Defendant Name:	First: RICHARDSON	Middle: JAVIER	Last: ROSARIO

- 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.
- 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.
- This complaint consists of the preceding page(s) numbered 1 through    .
- 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.)**

\_\_\_\_\_ (Date) \_\_\_\_\_ (Year)

*NAI Dey / Ledez / Des...*  
 (Signature of Affiant)

AND NOW, on this date *May 11/19* 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.

*117-03*  
 (Magisterial District Court Number)

*[Signature]*  
 (Issuing Authority)

