

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: COLUMBIA

Magisterial District Number: 26-2-01
MDJ: Hon. RUSSELL L. LAWTON
Address: 700 SAWMILL ROAD, SUITE 102
BLOOMSBURG, PA. 17815

Telephone: (570)784-1868



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

PAULA

BROOKING

First Name

Middle Name

Last Name

Gen

1422 Old Berwick Road, Bloomsburg, Pa. 17815

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-324-19</u>	Date Filed <u>9/18/19</u>	OTN/LiveScan Number <u>47502692</u>	Complaint/Incident Number <u>GVSC0030-19</u>	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB <u>03/07/1978</u>	POB	Add'l DOB / /	Co-Defendant(s) <input checked="" type="checkbox"/>
First Name	Middle Name	Last Name	Gen.	

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

FBI Number MNU Number WEIGHT (lbs.)

Defendant Fingerprinted YES NO Ft. HEIGHT In.

Fingerprint Classification: 5 4

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).

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, NA BRADLEY DAVIS / PTLM. VINCE TAGGART

AT 723987 672 / 31-3

(Name of the Affiant)

(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General
(Identify Department or Agency Represented and Political Subdivision)

PA0222400
(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. 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 [222] Scott Township
(Subdivision Code) (Place-Political Subdivision)

in COLUMBIA County

[19]
(County Code)

on or about 04/02/2019 THROUGH 05/23/2019

RECEIVED SEP 18 2019



POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: PAULA	Middle:	Last: BROOKING

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"/> Lead?	1	6111	C	of the	TITLE 18	4	F-3		
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): **SALE OR TRANSFER OF FIREARMS**

Acts of the accused associated with this Offense: On or about April 2, 2019 through May 23, 2019, the defendant purchased firearms for Lester ARMSTRONG to possess. The defendant and ARMSTRONG were both aware that ARMSTRONG was a person not to possess firearms. To Wit: On 05/23/2019 police were called to the defendant's residence for a report of shots fired. Further investigation revealed that ARMSTRONG had possessed and fired a handgun at a wounded animal. Further investigation revealed that between April 2, 2019 and May 11, 2019, the defendant purchased four firearms for the specific purpose of transferring them to ARMSTRONG who is a person not to possess firearms.

<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?	2	6111	C	of the	TITLE 18	4	F-3		
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): **CONSPIRACY TO COMMIT SALE OR TRANSFER OF FIREARMS**

Acts of the accused associated with this Offense: On or about April 2, 2019 through May 23, 2019, the defendant conspired with Lester ARMSTRONG to purchase firearms for ARMSTRONG to possess. The defendant and ARMSTRONG were both aware that ARMSTRONG was a person not to possess firearms. To Wit: On 05/23/2019 police were called to the defendant's residence for a report of shots fired. Further investigation revealed that ARMSTRONG had possessed and fired a handgun at a wounded animal. Further investigation revealed that between April 2, 2019 and May 11, 2019, the defendant purchased four firearms for the specific purpose of transferring them to ARMSTRONG who is a person not to possess firearms.

<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?	3	4904	a, 1	of the	TITLE 18	4	M-2		
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): **UNSWORN FALSIFICATION**

Acts of the accused associated with this Offense: The defendant, with intent to mislead a public servant in performing his official function, made a written false statement which she did not believe to be true. To Wit: On or about April 2, 2019 through May 23, 2019, the defendant purchased four firearms for Lester ARMSTRONG whom she knew was a person not to possess firearms. The defendant filled out four PSP Records of Sale which indicated that she was the buyer of the firearms and was not purchasing them on behalf of someone else.



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Defendant Name:	First: PAULA	Middle:	Last: BROOKING

- 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 3.
- 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.

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.)

9/18/19
(Date)

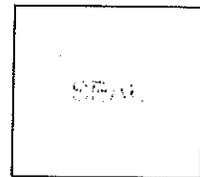
[Signature]
(Signature of Affiant)

AND NOW, on this date 9/18/19 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.

26-201
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





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Defendant Name:	First: PAULA	Middle:	Last: BROOKING

AFFIDAVIT of PROBABLE CAUSE

1. Your Affiant is Agent(Agt.) Bradley Davis, a Narcotics Agent employed by the Pennsylvania Office of Attorney General(OAG); Bureau of Narcotics Investigations. Agt. DAVIS has over nineteen years of law enforcement/criminal investigative experience.
2. Your Co-Affiant is Patrolman(PtIm.) Vincent TAGGART, a Police Officer employed by the Scott Township Police Department. PtIm. TAGGART has twenty years of law enforcement/criminal investigative experience.
3. This investigation was initiated by the OAG upon receiving a referral from PtIm. TAGGART of Scott Township Police Department. Scott Township Police Department is located at 350 Tenny Street, Bloomsburg, PA. in Columbia County. PtIm. TAGGART indicated that he had investigated a report of shots fired and found that numerous firearms had been straw purchased. PtIm. TAGGART indicated that his investigation found that Paula BROOKING had purchased firearms on three separate occasions and provided these firearms to a person not to possess firearms. This person was identified as co-defendant, Lester ARMSTRONG, who resided at the same address as BROOKING.
4. Agt. DAVIS reviewed the information provided by PtIm. TAGGART and found the following:
 - a. A police report indicated that on 05/23/2019, Patrolman TAGGART, of the Scott Township Police Department, responded to 1422 Old Berwick Road, Bloomsburg, PA., in Columbia County for a report of shots fired. Upon his arrival, PtIm. TAGGART learned that a male subject from the above address had shot at an injured raccoon. This male was identified as Lester ARMSTRONG who was wearing an empty holster on his side. The report indicated that the handgun used to shoot at the raccoon was inside the residence and was registered to Paula BROOKING who resided at the same address. The report indicated that ARMSTRONG stated he was permitted to carry a firearm but further investigation revealed that ARMSTRONG had been denied a permit to carry by the local Sheriff's Department. ARMSTRONG was also found to be a person not to possess a firearm.
 - b. The report indicated that Patrolman TAGGART spoke with BROOKING who advised that there were pistols and rifles in the residence that were registered to her. The report indicated that BROOKING willingly turned the following firearms over to Scott Township Police. These firearms were identified as follows:
 - 1 - Archon Firearms .9mm bearing serial #AA0000136
 - 1 - AR-15 Sig Sauer Spikes Tactical bearing serial #SDR006734
 - 1 - Sig Sauer P320 .9mm bearing serial #58C117006
 - 1 - Armscor Precision International Rock Island pistol bearing Serial #R1A1774650
 - c. The report indicated that BROOKING was advised of her Miranda Warnings and she agreed to further speak with Patrolman TAGGART. According to the report, BROOKING advised that ARMSTRONG had given her money and she purchased the firearms for ARMSTRONG. BROOKING further indicated that she knew ARMSTRONG was not permitted to possess



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firearms and confirmed that ARMSTRONG had shot at an injured raccoon that evening. BROOKING indicated that she had purchased the above firearms from Susquehanna Valley Firearms.

d. On 05/29/2019, the report indicated that Ptlm. TAGGART went to Susquehanna Valley Firearms and confirmed that BROOKING had purchased the above firearms from them. They were purchased as follows:

- On 04/02/2019, BROOKING purchased the Sig Sauer P320 .9mm.
- On 04/25/2019, BROOKING purchased the Sig Sauer Spikes Tactical AR-15.
- On 05/11/2019 BROOKING purchased the Archon Firearms .9mm and the Armscor Precision International Rock Island pistol.

e. The report indicated that Ptlm. TAGGART confirmed the proper paperwork was completed by Susquehanna Valley Firearms on the sales of the above firearms. The report indicated that Ptlm. TAGGART viewed the paperwork and observed that it was signed by BROOKING. BROOKING also indicated that she was the actual buyer/transferee of the firearms.

5. On 07/24/2019, Agt. DAVIS met with Ptlm. TAGGART at the Scott Township Police Department. Ptlm. TAGGART advised Agt. DAVIS that he wished for the OAG to take over the investigation and file any subsequent charges in the matter. Ptlm. TAGGART turned over his case file to Agt. DAVIS which included the following:

- a. On 05/23/2019 Ptlm. TAGGART responded to a shots fired call involving Lester ARMSTRONG. Ptlm. TAGGART was wearing a body camera which was activated. Footage of the interaction showed ARMSTRONG sitting on the porch of his residence when Ptlm. TAGGART made contact with him. ARMSTRONG indicated that he had shot at an injured raccoon but though he may only have grazed it. ARMSTRONG indicated that he was permitted to possess firearms and was wearing an empty black holster on his right side. ARMSTRONG also indicated that he had previously been denied a purchase. Ptlm. TAGGART asked ARMSTRONG if he had ever been hospitalized before. ARMSTRONG indicated not for firing a gun at an injured animal.
- b. The video showed Ptlm. TAGGART speak with Paula BROOKING. BROOKING advised that she had purchased guns for ARMSTRONG and that they were inside the residence. BROOKING and Ptlm. TAGGART proceeded inside the residence where four firearms were taken from the bedroom belonging to ARMSTRONG and the bedroom belonging to BROOKING. BROOKING was given her Miranda Warnings, which she acknowledged, and further spoke with Ptlm. TAGGART about the guns. BROOKING advised that ARMSTRONG had given her the money to purchase the four firearms which she purchased at Susquehanna Valley Firearms. BROOKING advised that she purchased the guns for ARMSTRONG at his request and knew that he was not to possess firearms. BROOKING indicated that ARMSTRONG had two



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misdemeanors on his record. BROOKING denied knowing it was a crime to purchase ARMSTRONG firearms until being told by police at this incident.

- c. Ptlm. TAGGART provided Agt. DAVIS with documentation from the Behavioral Health and Developmental Services. This documentation showed that on 02/22/2005, ARMSTRONG was involuntarily committed, due to mental health concerns, at the Bloomsburg Hospital located at 549 East Fair Street, Bloomsburg, PA. The documents indicated that ARMSTRONG was suicidal and made statements that he would hurt someone.
 - d. Ptlm. TAGGART provided Agt. DAVIS with a police report from Berwick Police Department located at 1800 North Market Street, Berwick, PA., 18603. This report indicated that police responded to a complaint that ARMSTRONG had assaulted his girlfriend, Melissa GARCIA, on 08/12/1999. The report indicated that GARCIA had gone to ARMSTRONG'S residence to end the relationship and retrieve her cell phone. The report indicated that when GARCIA informed ARMSTRONG that the relationship was over, ARMSTRONG began punching and dragging GARCIA around the residence. The report further indicated that GARCIA attempted to flee but ARMSTRONG restrained GARCIA for approximately two hours and held a knife to her throat before finally letting her go. The report further indicated that while in prison for the above assault, ARMSTRONG threatened GARCIA'S cousin by stating that he would put a knife to his throat. The report indicated that ARMSTRONG was found guilty of False Imprisonment and Terroristic Threats stemming from the above two incidents.
 - e. Ptlm. TAGGART provided Agt. DAVIS with body cam video/audio of the voice message left at Susquehanna Valley Firearms by ARMSTRONG. During this video, a man identified himself as Lester ARMSTRONG and indicated that the police had just been at his residence. ARMSTRONG further indicated that all the guns had been taken because he had discharged a firearm to kill a wounded animal. ARMSTRONG indicated he used the 9mm P320 to shoot the animal. It is noted that BROOKING purchased a Sig Sauer 9mm P320 on 04/02/2019.
 - f. Ptlm. TAGGART provided Agt. DAVIS with four sets of the Pennsylvania State Police Application/Record Of Sale and with three sets of ATF Form 4473. These forms listed the purchase of all four firearms. On all of these forms, BROOKING indicated that she was the buyer of these firearms and was not buying them on behalf of someone else.
6. On 07/24/2019, Agt. DAVIS went to Susquehanna Valley Firearms located at 2411 Columbia Boulevard, Bloomsburg, PA., 17815. Agent DAVIS spoke with the owner, James IREY, who



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Defendant Name:	First: PAULA	Middle:	Last: BROOKING

advised that his store sold guns to Paula BROOKING on three occasions. IREY advised that all three times Lester ARMSTRONG was present with BROOKING. IREY advised that on the third time, ARMSTRONG indicated that he was not able to possess firearms due to an accident. IREY advised that he then checked ARMSTRONG for any local arrests and did not see anything but decided that he would not sell anymore firearms to BROOKING due to ARMSTRONG'S statement. IREY advised that right after the police incident involving ARMSTRONG shooting at an animal, ARMSTRONG called his store and left a message indicating that police had taken his firearms. IREY advised that ARMSTRONG apparently though that the firearms had been returned to his store. IREY no longer had a copy of this recorded call.

- The investigations of Agt. DAVIS and Ptlm. TAGGART revealed that BROOKING purchased firearms on three separate occasions for the specific purpose of and knowingly transferring the firearms to a person not to possess firearms, Lester ARMSTRONG. As a result, Agt. DAVIS and Ptlm. TAGGART are requesting a warrant be issued for BROOKING to answer to the charges listed herein.

I, NA BRADLEY DAVIS / PTLM. VINCE TAGGART, 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.

Brad Davis / Vince Taggart

 (Signature of Affiant)

Sworn to me and subscribed before me this 18th day of September, 2019



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Defendant Name:	First: PAULA	Middle:	Last: BROOKING

9/18/19 Date *[Signature]*, Magisterial District Judge

My commission expires first Monday of January, 2022



SEAL