

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: LACKAWANNA

Magisterial District Number: 45-1-05
MDJ: Hon. TERRENCE GALLAGHER
Address: 1600 FARR STREET SCRANTON PA

Telephone: (570)963-6504



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
SAMANTHA MARY PIASECKI
First Name Middle Name Last Name

407 WEST TAYLOR STREET SCRANTON PA 18517

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	Date Filed 01/11/2021	OTN/LiveScan Number	Complaint/Incident Number GVS-210001	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 09/14/1999	POB PA	Add'l DOB / /	Co-Defendant(s) <input 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 type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <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 checked="" 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) <input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) 160	Ft. HEIGHT In. 5 5	
FBI Number	MNU Number	Defendant Fingerprinted <input checked="" type="checkbox"/> YES <input 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).

Brian J. Gallagher DDA
(Name of the attorney for the Commonwealth)

Brian J. Gallagher DDA
(Signature of the attorney for the Commonwealth)

01/11/2021
(Date)

I, <u>NA BLOCK AND LACKAWANNA DET DAVIS</u> (Name of the Affiant)	<u>740 & 13-04</u> (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of <u>Pennsylvania Office of Attorney General</u> (Identify Department or Agency Represented and Political Subdivision)	<u>PA0222400</u> (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 [] (Subdivision Code) (Place-Political Subdivision)	
in <u>LACKAWANNA</u> County <u>[35]</u> (County Code)	on or about <u>OCTOBER 10, 2020</u>



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Defendant Name:	First: SAMANTHA	Middle: MARY	Last: PIASECKI

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"/>	1	6111	(c) of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input checked="" type="checkbox"/> 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: Any person, licensed dealer, licensed manufacturer or licensed importer who knowingly or intentionally sells, delivers or transfers a firearm under circumstances intended to provide a firearm to any person who is unqualified or ineligible to control, possess or use a firearm commits a felony. TO WIT: PIASECKI did knowingly and intentionally purchase and transferred 1 pistol to prohibited persons.								

<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"/>	2	4904	(A)(1) of the	18	1	M2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> 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 TO AUTHORITIES								
Acts of the accused associated with this Offense: A person commits a misdemeanor of the second degree with the intent to mislead a public servant in performing his official function, if he or she (1) makes any written false statement which he does not believe to be true. TO WIT: PIASECKI did purchase a firearm not for herself, but for another person who was prohibited.								

<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"/>	3	4911	(A)(1) of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> 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): TAMPERING WITH PUBLIC RECORDS								
Acts of the accused associated with this Offense: (A) A person commits an offense if he: (1) knowingly makes a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government. TO WIT: PIASECKI gave the following false information on the 4473 and state form: On question 2. She provided the following incorrect address: 838 Moosic Street Scranton PA., On question 11a. She was the actual firearm purchaser/buyer of the firearms On question 11e. that she was not addicted to narcotic drugs/ controlled substances.								



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Defendant Name:	First: SAMANTHA	Middle: MARY	Last: PIASECKI

- 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.)

01/11/2021

NA Blood / Det Tom Duro
 (Signature of Affiant)

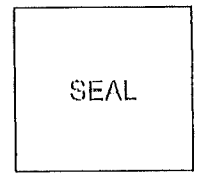
(Date) (Year)

AND NOW, on this date 1.11.21 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.

Court Comm Pleas
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





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AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Agent Daniel Block (NA Block), being duly sworn, deposes and says, I am Narcotics Agent employed by the Office of Attorney General, Bureau of Narcotics Investigation and Drug Control (OAG-BNI) assigned to the Gun Violence Section since 2020. As such, I am tasked with investigating violations of the Pennsylvania Crimes Code including Violations of the Uniform Firearms Act (18 Pa.C.S.A. § 6105, 6106), illegal firearm transfers and straw purchases (18 Pa.C.S.A. § 6111) and violations of the Controlled Substance, Drug, Device and Cosmetic Act of April 1972, P.L. 233, No. 64, 35 P.S. §780-101 et. seq., Corrupt Organizations (18 Pa. C.S.A. §911) and charges recommended by a statewide investigating grand jury. Your Affiant has participated in numerous illegal firearm trafficking, straw purchase investigations, narcotic investigations and related search and arrest warrants throughout the Commonwealth. I am currently detailed to the Bureau of Alcohol, Tobacco and Firearms Task Force as a federal task force officer and am tasked with investigating both state and federal violations relative to firearms trafficking, straw purchasing and felons in possession of firearms.

Prior to my current assignment in gun trafficking, your Affiant investigated internet crimes for the OAG against children since December of 2012. I actively participated in numerous investigations throughout the Commonwealth of Pennsylvania dealing with online solicitations for sexual offenses and/or attempted sexual offenses with minors in addition to unlawful contact with minors, sexual abuse of children and criminal use of communications facilities. Your Affiant has conducted international criminal investigations, including kidnappings, and other crimes of violence. I was also a Task Force Officer with Homeland Security Investigations Child Exploitation/Trafficking Group. Prior to joining the OAG as an agent, your Affiant worked uniform patrol, starting in 1999, for the St. Louis County Police Department, St. Louis Missouri. Your Affiant completed the Class "A" Pennsylvania State Police Wiretapping and Electronic Surveillance Training School as mandated in Section 5742 of Act 18, Pa.C.S.A. 5701 et seq. I have authored hundreds of search and arrest warrants in my capacity as a police officer, narcotics officer, task force officer and plainclothes agent.

Your Co-Affiant Detective Thomas Davis employed by the Lackawanna County District Attorney's office. Detective Davis is certified municipal police officer. As such, he has been a certified police for 22 years, has conducted numerous felony investigations involving firearms, narcotic and related felony investigations for over 20 years.

Your Affiants, being duly sworn according to law, depose and say:

In December, 2020, Special Agent (SA) Michael Jacobi, who is employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF Philadelphia Field Division, Allentown Field Office), became aware of an ongoing illegal firearms trafficking investigation from the ATF Baltimore Field Division. SA Jacobi became aware of, and subsequently joined, an ongoing investigation into straw purchasing firearms in Pennsylvania by Gregory DEHART (DOB 01/02/1990). ATF- Baltimore Field Division recovered a firearm purchased by DEHART in the Scranton, PA area. It was subsequently learned that DEHART had purchased numerous firearms in Lackawanna County Pennsylvania during the previous year, has minimal reported income during that period, has not resided at the address provided on the ATF Form 4473's during that time, and that another firearm purchased by DEHART was recovered in New York City.

Eventually it was determined, since December of 2019, DEHART illegally purchased and subsequently illegally transferred at least 27 handguns in and around Lackawanna County, Pennsylvania. On January 6, 2021, DEHART was arrested and charged for 27 counts of the following: 18 Pa.C.S.A. § 6111 (C) Sale or Transfer of Firearms, 18 Pa.C.S.A. § 4909 (A)(1) Unsworn Falsification to Authorities, and 18 Pa.C.S.A. § 4911 (A)(1) Tampering with Public Records.



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On or about January 6, 2021, your Affiants became aware that DEHART'S girlfriend, Samantha PIASECKI (DOB 09/14/1999), wanted to speak with them.

PIASECKI contacted your Affiants at the Scranton Office of the Pennsylvania Office of Attorney General. There PIASECKI was advised of her Miranda Rights by your Affiant Agent Block. The rights were given to PIASECKI in written and verbal form before any questioning. PIASECKI indicated that she understood her rights and having her rights in mind, she would answer questions without counsel being present. PIASECKI then signed an Advice of Rights form, documenting her decision to do so. The interview was audio recorded and it was explained to PIASECKI that she was not under arrest and she could stop the interview whenever she chose.

Among other things, PIASECKI stated the following information:

PIASECKI stated she has dated DEHART for a number of years (and has a child with him) and that she was aware of DEHART'S illegal straw purchasing and firearm supply operation and accompanied him to gun stores multiple times. In the fall of 2020, DEHART asked her to purchase a gun because he thought he purchased too many firearms under his name. She stated, the firearm was purchased for the same known but unnamed individual who DEHART purchased firearms for previously. This individual also funded the purchase and an additional \$75 for her efforts in obtaining the handgun. PIASECKI stated, in early October of 2020, she purchased a pistol from J & G Sport Center, 600 Sanderson Street, Throop PA 18512. She stated, DEHART went with her to J & G Sport Center to get the firearm then they went to unnamed individual's house where DEHART delivered it to him. Shortly after, DEHART returned without the pistol and paid PIASECKI.

PIASECKI stated that she has been addicted to marijuana, heroin/fentanyl, and other narcotics for over a year.

PIASECKI stated that she has not lived at the 838 Moosic Street address for over a year.

PIASECKI stated that she knew the known but unnamed individual did several years in prison, making him ineligible to purchase or carry a firearm.

PIASECKI stated that she knew buying a firearm for someone else was illegal however she did it for the money.

ATF SA Jacobi and your Affiants obtained and reviewed the Firearms Transaction Form/4473 and the Application/Record of Sale that PIASECKI completed at J & G Sport Center, dated 10/08/2020. Both the federal and state gun purchase paperwork were reviewed with PIASECKI. She acknowledged that it was her handwriting and she completed the 4473 to include section 10, where she listed 838 Moosic Street Scranton, PA 18510 as her address, section 21(a), where she indicated "YES" that she was the actual transferee/buyer of the listed firearm, section 21(e), where she indicated that "NO" she was not an unlawful user of any narcotic drugs or controlled substances, and section 22, was her signature to



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certify the provided information as true, correct, and complete. PIASECKI acknowledged that she willfully provided false information in these responses and that she did the same on the state firearm transfer document and then transferred the firearm to the known but unnamed individual whom she knew was a prohibited person.

It should be noted, the fire arm PIASECKI purchased on October 8, 2020 from J & G Sporting Center is a Smith and Wesson 4043, .40cal pistol, serial TZS3762.

It should be noted, this illegal purchase/transfer occurred in Lackawanna County.

Based on the totality of the foregoing information, circumstances and reasonable inferences to be drawn therefrom, your Affiant submits that there is probable cause for the filing of this criminal complaint charging ", Samantha PIASECKI (DOB 09/14/1999) an adult female, with the aforementioned felonies described above among other offenses.

I, NA BLOCK AND LACKAWANNA DET DAVIS, 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 Block / Det Tom Davis
(Signature of Affiant)

Sworn to me and subscribed before me this 11 day of JAN 2021
1.11.21 Date [Signature] Magisterial District Judge Court

My commission expires first Monday of January,

Comm Pleas
SEAL