#### COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: LEHIGH COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 31-2-03 VS. MDJ: Hon. DONNA BUTLER (NAME and ADDRESS): Address: 106 MAIN STREET, EMMAUS PA JAMES **GLEASON** 18049 First Name Middle Name Last Name Ge 251 POWDER MILL LANE, APT 4, EMMAUS, PA 18049 Telephone: (610)967-2888 NCIC Extradition Code Type □ 1-Felony Full 5-Felony Pending Extradition □ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION **Docket Number** Request Lab **Date Filed** OTN/LiveScan Number Complaint/Incident Number Services? 403) 05/05/2021 ☐ YES ☐ NO GVS-210049 GENDER ров 10/01/1982 ров Ра Co-Defendant(s) Add'l DOB Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE White ■ White ■ Near the second contact the s Asian Black Native American Unknown Hispanic ETHNICITY Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) GRN (Green) XXX (Unk./Bald) Color PNK (Pink) ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) Eye GRN (Green) GRY (Gray) Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) ☐ MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) **FBI Number** 243902HD4 **MNU Number** 200 **Defendant Fingerprinted** ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 5 7 DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth. NCIC Veh. Code Reg. Plate #5 mat Ind. Sticker (MM/YY) same $\Box$ 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). 05/*5*/2021 ame of the attorney for the Commonwealth) I, NA BLOCK AND DET KNOBLAUCH 740/61 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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 [ 405] 251 Powder Mill Lane, Apt 4, Emmaus, Pa 18049 (Place-Political Subdivision)

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[39]

in LEHIGH County

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on or about DECEMBER 2020 TO MAY 3 2021



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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number GVS-210049
Defendant Name:	First: JAMES	Middle:	Last: GLEASON

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered  $\underline{1}$  through  $\underline{\hspace{1cm}}$ .
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently 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.)

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			NABled Star Frables
(Date)	(Y	'ear)	(Signature of Affiant)
AND NOW, on this date	5 5	2 certify that the comp	plaint has been properly completed and verified.
An affidavit of probable cause mus	t be complete	ed before a warrant can be issued.	
31-2-03		Ofma R Pon	
(Magisterial District Court Number	)	(Issuing Authority)	



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	First:	Middle:	Last:	
Defendant Name:	JAMES		GLEASON	

#### 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 Knoblauch has been employed by the Borough of Emmaus Police Department since March of 2008. He has been assigned to Criminal Investigations since 2019.

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

In April of 2021, ATF Agent Jacobi started an investigation into a Jenna L. Gleason related to possible straw purchases and illegal transfer of firearms in regards to the following firearms purchased by Jenna Gleason.

#	Date of purchase	Firearm description	FFL	County
1	12/10/2020	Kimber Micro 9 9mm pistol bearing SN TB0020001	Cabela's	Berks
2	12/10/2020	Ruger LCP .380 caliber pistol bearing SN 372395215	Cabela's	Berks
3	01/16/2021	FN FNX-45 .45 caliber pistol bearing SN FX3U142202	Cabela's	Berks

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4	01/24/2021	Taurus 85 .38	Sun Down	Wayne
		caliber	Gun Shop	(Gun show in
		revolver		Bucks)
		bearing SN		
		ABN355771		
5	01/24/2021	SAR Arms	Sun Down	Wayne
		9mm pistol	Gun Shop	(Gun show in
		bearing SN T-		Bucks)
		1102-		
	01/24/2024	20BV84969		
6	01/24/2021	ATI AR-15	Sun Down	Wayne
		MilSport rifle	Gun Shop	(Gun show in
		bearing SN MSA067732		Bucks)
7	01/28/2021	Smith &	Eastern Arms	Bucks
		Wesson M&P	& Outfitters	Julia
		15-22 .22 LR		
		caliber pistol		
		bearing SN		
		WAF7453		
8	01/28/2021	Rock Island	Eastern Arms	Bucks
		M1911 A2 .45	& Outfitters	
		caliber pistol		
		bearing SN		
		RIA2202368		
9	01/28/2021	Taurus G2C	Eastern Arms	Bucks
		9mm pistol	& Outfitters	
		bearing SN		
10	02/05/2024	1C008445		
10	02/05/2021	Taurus 856 .38	The Bunker	Bucks
		caliber	Gun Shop II	
		revolver		
		bearing SN		
11	02/05/2024	ABK006676		
11	02/05/2021	Smith &	The Bunker	Bucks
		Wesson M&P	Gun Shop II	
		45 .45 caliber		
		pistol bearing		
12	02/05/2021	SN DYD8559	T. D.	
12	02/05/2021	KelTec	The Bunker	Bucks
		Sub2000 9mm	Gun Shop II	



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		rifle bearing SN FFHW33		
13	02/17/2021	Taurus G2C 9mm pistol bearing SN 1C009949	American Arms & Ammunition	Montgomery
14	02/17/2021	Glock 22GEN3 .40 caliber pistol bearing SN CZY391US	American Arms & Ammunition	Montgomery
15	02/20/2021	AMT Back up .380 caliber pistol bearing SN DA36774	Xtreme Gun Worx	Lehigh
16	02/20/2021	Smith & Wesson Bodyguard .380 caliber pistol bearing SN KHV0695	Xtreme Gun Worx	Lehigh
17	02/20/2021	Smith & Wesson Shield 9mm caliber pistol bearing SN JHR4086	Xtreme Gun Worx	Lehigh
18	02/20/2021	Smith & Wesson 638 .38 caliber revolver bearing SN DNL4244	Xtreme Gun Worx	Lehigh
19	02/27/2021	Rock Island 1911 .45 caliber pistol bearing SN RIA2269002	Eastern Arms & Outfitters	Bucks
20	02/27/2021	Ruger LCP II .380 caliber pistol bearing SN 380623243	Eastern Arms & Outfitters	Bucks

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 First:
 Middle:
 Last:

 JAMES
 GLEASON

21	03/09/2021	Taurus The Judge .410/.45 caliber revolver bearing SN ACA421781	Eagle Arms	Lehigh
22	03/11/2021	Diamondback DB9 9mm pistol bearing SN YL8736	Eastern Arms & Outfitters	Bucks
23	03/16/2021	Bersa Thunder 40 .40 caliber pistol bearing SN E39350	Donley's Gun Shop	Bucks
24	03/16/2021	Kahr Arms CW40 .40 caliber pistol bearing SN FG4964	Donley's Gun Shop	Bucks
25	03/16/2021	KelTec PF-9 9 mm pistol bearing SN RV588	Donley's Gun Shop	Bucks
26	03/17/2021	Glock 43 9mm pistol bearing SN AFER440	Eastern Arms & Outfitters	Bucks
27	04/10/2021	Rock Island M1911A1 .45 caliber pistol bearing SN RIA2307665	Eastern Arms & Outfitters	Bucks
28	04/10/2021	Glock 43 9mm pistol bearing SN AFLC310	Eastern Arms & Outfitters	Bucks
29	04/10/2021	Diamondback DB9 9mm pistol bearing SN YL8739	Eastern Arms & Outfitters	Bucks



## M POLICE CRIMINAL COMPL

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These gun purchases were all part of the same criminal conspiracy between James Gleason Jr Jr., Jenna Gleason and Reynold Lewis. As part of the same criminal episode, they are being brought in in Lehigh County pursuant to rule 130(A)(3).

On April 28, 2021, at approximately 12:30pm, your Affiants contacted Jenna Gleason

Jenna Gleason informed her that she was not under arrest, free to stop talking and free to walk away from us at any time. We informed her of our investigation and asked her about the aforementioned firearms, she stated she wanted to be honest and cooperate, among other things Jenna Gleason stated the following:

That she has been dating/married to her husband James Gleason Jr (DOB 10/01/1982) for the last seven years. She stated during that time, he began to smoke meth. She stated that his addiction spun out of control and eventually (for the last 2 years) he was doing meth on a daily basis. She stated her husband had been arrested for aggravated assault and other assault related charges.

She stated since December of 2020, she also has been doing meth once a week or so due to a life stress.

She stated that James Gleason Jr's drug dealer is described as: a black male, who goes by "Press", named "Reynold Lewis" on her Facebook (later identified as Reynold Lewis), hereinafter referred to as Lewis), lives in various Allentown hotels, drives a maroon Ford SUV, has spent time in prison throughout his life, and deals a lot of meth with individuals other than her husband. It should be noted, Jenna Gleason was later shown an undated, unnamed, photo of Lewis, whom she identified as Lewis.

Jenna Gleason stated that in late 2020, James Gleason Jr got a lot of meth from Lewis and was unable to pay for it. Jenna Gleason stated that Lewis threated both of them saying either pay the debt, buy guns for him or he would physically harm them. She stated they didn't have the money, so she began to buy firearms for Lewis.

Since December of 2020, she stated she has purchased the aforementioned firearms.

She stated that Lewis would communicate with her husband as to which type of firearms and where they would purchase them. Once the details were decided, Jenna Gleason would to go the store with James Gleason Jr or Lewis. She stated at times just Lewis would drive her to the store and wait in the Ford SUV for her to make the purchase. She stated at times he (Lewis) would pay her \$75 per gun purchased, or he (Lewis) would give her husband meth. She stated once she purchased the firearms, she would bring them out to the vehicle and give them to either James Gleason Jr or Lewis and never see the firearms again.

Questions 21a of the Federal 4473 form were read aloud to Jenna Gleason. On question 21a Jenna Gleason checked that she was the actual buyer of the firearm. Question 21a articulates the following, "You are the actual transferee/buyer of the firearms". All the 4473 forms showed that Jenna Gleason checked "Yes", indicating she was the actual buyer of the firearms. Jenna Gleason stated she was lying, she knew the firearms were not for her and were for another person, specifically Lewis. She also stated she knew Lewis had been in prison off and on since he was in his teens, and she was sure he could not purchase firearms legally.





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Questions 21c of the Federal 4473 form were read aloud to Jenna Gleason. Question 21c articulates, "Are you an unlawful user of, or addicted to, marijuana or any depressants, stimulant, narcotic drug or controlled substance". On all of the 4473, Jenna Gleason checked "No". Jenna Gleason stated she was lying, as she was addicted to meth and had been using since December of 2020.

Jenna Gleason agreed to recorded statement regarding to the above statements. In that statement she stated the following:

That she has known her husband for seven years.

That he has been doing meth regularly for the last two years.

That he has several felony indictments against him for aggravated assault and simple assault and other related

That she doesn't believe he (James Gleason Jr) can purchase firearms legally.

That she has been using meth a few times a month since December of 2020.

That she started purchasing firearms for James Gleason Jr's (her husband) drug dealer (Lewis) because he threatened them.

That the drug dealer's name is Reynold then described Lewis.

That she has purchased over 20 firearms for Lewis.

That she has purchased guns from multiple gun shops, throughout Pennsylvania.

That she recently tried to purchase firearms for Lewis as recently as Sunday, April 25, 2021.

That Lewis would pay either in cash or "knock of what is owed" or give her husband drugs in exchange for the guns she was purchasing.

That she indicated on the federal forms that the firearms were for her and in reality they were not.

That she indicated on the federal forms that she was not a drug user and in reality she does use meth.

That she hates doing this and does it to protect herself and people she loves.

That she realizes purchasing firearms for others is illegal.

That Lewis and her husband decide on the gun store she is going to

That when she purchases the guns, gives them to Lewis or her husband and never sees the firearms again.

The recording was saved to file.

An intelligence analyst for the Pennsylvania Office of Attorney General among other things conducted a criminal history check on Lewis. This check revealed that Lewis has a history of gun violence in multiple states:

New York criminal history

Court Disposition (Cycle 2) Court Case Number 06629-2003

Final Disposition Date 2004-03-10

Court Agency NY023015J Kings County Supreme Court Charge

Tracking Number 56653313R

Statute Criminal Possession Loaded Firearm-3rd Degree (265.02 SUB 04)

State Offense Code PL 265.02 SUB 04

Counts 1 Severity Felony

Inchoate Charge Completed Disposition (2004-03-10; Convicted Upon Plea of Guilty)

Sentencing (Cycle 2)

Sentence Date 2004-05-12

Court Case Number 06629-2003

Charge Tracking Number 56653313R

Statute Criminal Possession Loaded Firearm-3rd Degree (265.02 SUB 04)



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NCIC Offense Code 5299

State Offense Code PL 265.02 SUB 04 Counts 1

Severity Felony Inchoate Charge Completed Disposition (2004-05-12)

Sentence Probation: 5 Year(s)

Pennsylvania Criminal History

Date 2010/10/23

Charge CS13A30, Manufacture etc. of Controlled Substance by person not registered

Count 1, Grade F

Disposition plead guilty 2 yrs 3 mos it should be noted, this illegal activity occurred in Northampton County.

On May 3, 2021, your Affiants contacted James Gleason Jr at the Emmaus Police Department. There James Gleason Jr was informed of his Rights Per Miranda to which he stated he understood and signed the PA OAG Miranda form. James Gleason Jr stated he understood his rights, agreed to speak without legal representation and wished to cooperate with our investigation.

#### Among other things James Gleason Jr stated:

That he has been addicted to meth for the last several years. For the last six months or so his habit has been very bad. He stated he met "Press" (whom he also identified as Reynold Lewis) about six months ago. He stated he began to buy meth from Lewis in the fall of 2020. He stated he Lewis asked him if his wife could buy guns for him on more than one occasion. James Gleason Jr stated they were in a financially difficult situation and needed the money. James Gleason Jr stated they began to buy firearms in December of 2020. Since that time, James Gleason Jr stated they purchased approximately 25+ firearms for Lewis.

James Gleason Jr stated he knew Lewis could not purchase firearms due to his being a convicted felon. James Gleason Jr also stated he could not purchase firearms legally due to his recent arrest for aggravated assault.

James Gleason Jr agreed to audio record this discussion. During that recording among other things James Gleason

That he met Lewis via an altercation with his neighbor.

That he described Lewis as a black male who drives a Ford SUV with aftermarket wheels.

That Lewis approached James Gleason Jr asking him to buy guns for him.

That Lewis is a convicted felon and could not buy firearms.

That (he) James Gleason Jr could not purchase firearms due to pending charges.

That he and his wife started buying guns for Lewis in December of 2020.

He listed all of the aforementioned FLLs where they purchased firearms.

He stated that Lewis would pay either \$100-\$75 per firearm or the equivalent in meth

He stated Lewis would pick them up at their house in Emmaus, then Lewis would drive them to the gun store, then Jenna Gleason would buy the firearms, they would walk the guns out to Lewis' Ford, give the guns to Lewis, Lewis would drive them home, drop them off and take the guns with him.



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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 James Gleason Jr (DOB 10/01/1982) an adult male, with the aforementioned felonies described above among other offenses.

I, NA BLOCK AND DET KNOBLAUCH, 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.

(Signature of Affiant) Sworn to me and subscribed before me this , Magisterial District Judge My commission expires first Monday of January, 202