

From:

06/16/2021 18:50

#612 P.062/094

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DELAWARE



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Judicial District Number: 32-2-48

MDJ Hon. STROHL, WALTER A

Address: 27 S PENNELL RD
LIMA, PA 19037

Telephone: (610) 665-4110

DEFENDANT: (NAME and ADDRESS)

HUGO HYLAND
First Name Middle Name Last Name Gen
97 S KEYSTONE ST,
UPPER DARBY, PA 19082

NCIC Extradition Code Type

NCIC Extradition Code Type 1 - FELONY FULL

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-156-21	Date Filed 06/16/21	PTN/Live Scan Number R1474852	Complaint/Incident Number 01018P718E/PA 2021-823726	Request Lab Services? YES
Gender M	Date of Birth 08/28/1988	POB PA - USA	Add'l DOB	Co-Defendant? YES
Defendant Also Known As	Defendant's First Name	Middle Name	Last Name	Suffix
Race BLACK - B	Ethnicity NOT OF HISPANIC ORIGIN - N			
Hair Color BLACK - BLK	Eye Color BROWN - BRO			
DNA NO	DNA Location		Weight 170 LBS	
FBI Number	MNU Number		Height 5' 10"	
Defendant Fingerprinted NO	Fingerprint Classification			

DEFENDANT VEHICLE INFORMATION

Plate #	State	HazMat	Registration Sticker (MM/YY)	Commercial Vehicle?	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
VIN	Year	Make	Model	Style	Color		NO

Office of the Attorney of 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, Pa.R.Crim.P.607.)

Name of Attorney for Commonwealth - Please Print or Type (Signature of Attorney for Commonwealth) (Date)

I, TPR. LUKE MCILVAINE / *Thomas Ketter* 729286/13164 / #87
(Name of Affiant - Please Print or Type) (PSP/MPDET - Assigned Affiant ID Number & Badge #)

of PENNSYLVANIA STATE POLICE, TROOP O, EASTERN INT UNIT / *Folcroft PD* PAPSP1A00 / *PA0231200*
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORJ 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 is 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: 111
(Subdivision Code) 97 S KEYSTONE ST, UPPER DARBY TWP
(Place-Political Subdivision)

in DELAWARE County 23 on or about 5/16/2021 AT APPROX. 08:00 HRS
(County Code) (Offense Date)

From:

06/16/2021 18:50

#612 P.083/084



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 01018P718E/PA 2021-823726
Defendant Name	First HUGO	Middle	Last HYLAND

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.

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 0				
Lead? YES	Offense # 1	Section 911	Subsection B3	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code CC91	UCR/NIBRS CC91
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

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

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT, who was employed or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity.

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				
Lead? NO	Offense # 2	Section 7512	Subsection A	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code CC75	UCR/NIBRS CC75
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

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

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted thereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every instance where the communication facility is utilized constitutes a separate offense under this section.

From:

06/16/2021 18:51

#612 P.084/094



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P718E/PA 2021-823726
Defendant Name	First HUGO	Middle	Last HYLAND

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.

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				
Lead? NO	Offense # 3	Section 5111	Subsection A1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC51
PennDOT DATA (If applicable)			Accident Number	Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
DEAL IN PROC UNL ACT/INTENT TO PROMOTE

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did conduct a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represented the proceeds of unlawful activity, THE DEFENDANT acted with the intent to promote the carrying on of the unlawful activity.

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				
Lead? NO	Offense # 4	Section 780-113	Subsection A30	PA Statute (Title) 36	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)			Accident Number	Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device, and Cosmetic Act

From:

06/16/2021 18:51

#612 P.086/084



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 01018P710E/PA 2021-823726
Defendant Name	First HUGO	Middle	Last HYLAND

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.

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				
Lead? NO	Offense # 6	Section 780-113	Subsection A16	PA Statute (Title) 36	Count 1	Grade M	NCIC Offense Code CS13	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

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

INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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				
Lead? NO	Offense # 6	Section 780-113	Subsection A16	PA Statute (Title) 18	Count 1	Grade M	NCIC Offense Code CS13	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

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

INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:

The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

From:

06/16/2021 18:51 #612 P.086/084



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P718E/PA 2021-823726
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Defendant Name	First HUGO	Middle	Last HYLAND
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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.

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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Lead? NO	Offense # 7	Section 780-113	Subsection A30	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
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PennDOT DATA (if applicable)	Accident Number:	Interstate Indicator NO	Safety Zone NO	Work Zone NO
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Statute Description (Include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:
The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A30 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act

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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Lead? NO	Offense # 8	Section 780-113	Subsection A16	PA Statute (Title) 18	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
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PennDOT DATA (if applicable)	Accident Number:	Interstate Indicator NO	Safety Zone NO	Work Zone NO
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Statute Description (Include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:
The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

From:

06/16/2021 18:52

#612 P.087/084



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complain/Incident Number 01018P718E/PA 2021-823726
Defendant Name	First HUGO	Middle	Last HYLAND

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.

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				
Lead? NO	Offense # 8	Section 6105	Subsection A1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS 1B
PennDOT DATA (If applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

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

POSSESSION OF FIREARM PROHIBITED

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, being a person who has been convicted of an offense enumerated in subsection (b), within or without this Commonwealth, regardless of the length of sentence or whose conduct meets the criteria in subsection (c) did possess, use, control, sell, transfer or manufacture or obtain a license to possess, use, control, sell, transfer or manufacture a firearm in this Commonwealth

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				
Lead? NO	Offense # 10	Section 8106	Subsection A1	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code	UCR/NIBRS CC61
PennDOT DATA (If applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

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

FIREARMS NOT TO BE CARRIED W/O LICENSE

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did carry a firearm, namely, Smith and Wesson .40 Handgun, in a vehicle or concealed on or about his person, while outside his place of abode or fixed place of business, w/o a valid and lawfully issued license, in violation of this chapter of the PA Crimes Code.

From:

06/16/2021 18:52 #612 P.088/084



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	DTN/Live Scan Number	Complaint/Incident Number 01018P718E/PA 2021-823726
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Defendant Name	First HUGO	Middle	Last HYLAND
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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.

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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Lead? NO	Offense # 11	Section 911	Subsection B4	PA Statute (Title) 1B	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
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PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO
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Statute Description (include the name of statute or ordinance):
CONSP TO VIO 911B1, 911B2, 911B3

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, did conspire to violate the provisions of paragraphs (1), (2) or (3) of this subsection.

From:

06/16/2021 18:52 #612 P.089/094



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P718E/PA 2021-823726
Defendant Name	Defendant's First Name HUGO	Middle Name	Last Name HYLAND

- 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 2
- 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 statute 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.)

6-16-2021
(Date)

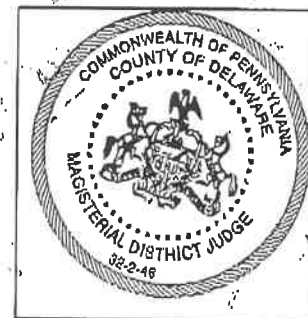
[Signature]
(Signature of Affiant)

AND NOW, on this date, 06/16/21 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.

32-1-31
(Magisterial District Court Number)

[Signature]
(Issuing Authority)

Philip S. Turno, Jr.



From:

06/16/2021 18:53

#612 P.090/094



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complain/Incident Number 01018P718E/PA 2021-023726
Defendant Name	First HUGO	Middle	Last HYLAND

AFFIDAVIT of PROBABLE CAUSE

THIS IS AN OFFICE OF ATTORNEY GENERAL PROSECUTION AND THE FOLLOWING CHARGES HAVE BEEN APPROVED BY DEPUTY ATTORNEY GENERAL KARIN JUDGE.

During the month of October 2020, your affiants, members of the Pennsylvania State Police, and the Delaware County Drug Task Force initiated a narcotics investigation into the Drug Trafficking Organization of Luis LLAMAS. At the direction of investigators and members of law enforcement confidential informants were utilized to complete five (5) controlled purchases of methamphetamine from October 2020 through March 2021, including one controlled purchase for approximately eight ounces of methamphetamine that was made in Upper Darby Township, Delaware County in December of 2020. Throughout the course of our investigation, your affiants and other members of law enforcement have confirmed that Luis LLAMAS is distributing methamphetamine, cocaine, fentanyl/heroin, marijuana and other narcotics in the City & County of Philadelphia, as well as Delaware County and Montgomery County, Pennsylvania and have identified associates within his Drug Trafficking Organization to be distributing narcotics in the City & County of Philadelphia, Delaware County and Montgomery County, Pennsylvania.

In May 2021 investigators engaged in a proactive investigation involving Non-Consensual Intercepts of the Drug Trafficking Organization. During the course of the investigation Luis LLAMAS, utilizing cellular telephone numbers 215-341-4072 and 267-344-7027, was found to be distributing methamphetamine, cocaine, fentanyl/heroin, marijuana (including THC infused "edible" products) and ecstasy pills.

Over the course of our investigation your affiants identified several persons within LLAMAS' drug trafficking organization. As a result of intercepted cellular telephone communications and surveillance, your affiants identified Lolyta LEE as LLAMAS' primary source of supply for marijuana and THC infused edible products. LEE, using cellular telephone 484-547

I, TPR. LUKE MCILVAINE *Luke Kesser* 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.

[Signature]
(Signature of Affiant)

Sworn to me and subscribed before me this 16th day of JUNE 2021

Date _____, Magisterial District Judge

My commission expires first Monday of January, 2022



From:

06/16/2021 18:53

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**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P718E/PA 2021-823726	
Defendant Name	First HUGO	Middle	Last HYLAND	

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

-1550, was intercepted on both LLAMAS' telephones. LEE made multiple deliveries of marijuana and THC infused product to LLAMAS at his Hope Street address and he met with LEE in Lower Merion Township, Montgomery County on May 15, 2021 to pay her \$10,000 for prior marijuana deliveries.

Hugo HYLAND, using cellular telephone (215) 459-0974, was identified as a person who LLAMAS' trusted to store quantities of controlled substances at his residence located at 97 South Keystone Road, Upper Darby Township, Delaware County. LLAMAS also relied on HYLAND to meet with source(s) of supply to pick up multi-pound quantities of methamphetamine and other drugs.

Juwan WOODS was identified as one of LLAMAS' trusted confederates. WOODS, using cellular telephone (215) 594-0974, was supplied controlled substances by LLAMAS, including cocaine. WOODS would also cook cocaine powder into cocaine base ("crack" or "hard") for LLAMAS. Your affiants ultimately conducted a Court authorized intercept of WOODS 215-594-0974 telephone facility. Interception began early June 2021. During the intercept of WOODS' phone, your affiants captured several conversations wherein WOODS made arrangements to sell both powder and cocaine base (crack or hard) to other persons as well as other controlled substances.

On June 2, 2021, a uniformed Pennsylvania State Trooper stopped a vehicle that contained a parcel. Your affiants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your affiants learned through LLAMAS' communications with others, including Kenneth SIMON, that at least part if not all of those 30 pounds were destined for LLAMAS and the members of his organization.

Kenneth SIMON and his wife Tiffany SIMON were integral parts of the LLAMAS drug trafficking organization. Kenneth and Tiffany SIMON together, and independently, came to LLAMAS' residence on North Hope Street to

conduct drug related transactions. LLAMAS would also go to the SIMONS' Conlyn Street address to engage in drug related transactions.

After June 2, 2021, LLAMAS was forced to find other sources of methamphetamine and WOODS stepped in to fill that void as WOODS had an alternate source for methamphetamine. WOODS would contact his source on LLAMAS' behalf and WOODS would coordinate multi-pound methamphetamine sales to LLAMAS. LLAMAS would often send or meet HYLAND with WOODS to pick up the methamphetamine. LLAMAS also relied upon HYLAND to deliver multi-pound quantities to distributors within the LLAMAS drug trafficking organization.

Zahid IGBAL, using cellular telephone facility 267-319-2908, was identified as one of LLAMAS' distributors for heroin/fentanyl and methamphetamine. IGBAL would come to LLAMAS' Hope Street address and other locations, to meet LLAMAS to pick up supplies of fentanyl/heroin and other controlled substances for distribution to other persons.

On June 15, 2021 your affiants prepared search warrants for the following locations and vehicles within the City & County of Philadelphia, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 3336 North Hope Street - Philadelphia, PA
2. 2948 Kip Street - Philadelphia, PA,
3. 3218 Tyson Avenue, Philadelphia PA 19149
4. 1422 North 52nd Street., Philadelphia PA 19131.
5. 1721 Conlyn Street, Philadelphia PA 19141
6. 3632 North 3rd Street, Philadelphia PA 19140
7. 101 West Sharpnack Street, Philadelphia PA 19119.
8. 2015 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1FD006533)



[Handwritten Signature]

(Signature of Affiant)

[*]

From:

08/16/2021 18:53

#612 P.092/094



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P718E/PA 2021-823726	
Defendant Name	First HUGO	Middle	Last HYLAND	

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

- 9. 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1250 VIN (1HGCV3F94LA004286)
- 10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900)
- 11. 2017 Black Nissan Maxima PA reg KXG-4899 VIN (1N4AA6AP5HC445219)
- 12. 2021 Grey Toyota Tundra ZPY6195 VIN (5TFAY6F10MX007232)
- 13. 2017 Silver Ford Taurus PA registration LGP8637 VIN (WA1LGAFE1FD006533)

The search warrants were presented to and approved by Philadelphia County Common Pleas Judge Honorable Anne Marie Coyle on June 15, 2021

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Upper Darby Township, Delaware County, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

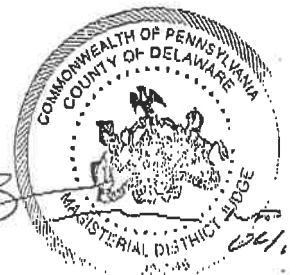
- 1. 97 South Keystone Road, Upper Darby Township, Delaware County, PA
- 2. 2003 Maroon Ford F-150 PA registration ZMK-4067 VIN(1FTRX18W33NA09123)

The search warrants were presented to and approved by the Honorable Kevin F. Kelly, President Judge of the Common Pleas Court of Delaware County.

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Pottstown Borough and Cheltenham Township, Montgomery, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL

- 1. 163 Grant Street, Pottstown, Montgomery County Pennsylvania
- 2. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania

The search warrants were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Damchick-Alloy on June 15, 2021



[Handwritten Signature]
(Signature of Affiant) [x]



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 01018P718E/PA 2021-823726	
Defendant Name	First HUGO	Middle	Last HYLAND	

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On June 16, 2021 shortly after 6:00 A.M., members of the Pennsylvania State Police, Delaware County Drug Task Force, Montgomery County Detectives, and Drug Enforcement Administration executed the aforementioned search warrants. During the search warrant executions in the City & County of Philadelphia, Montgomery County and Delaware County, Pennsylvania, Luis LLAMAS, Juwan WOODS, Zahid IGBAL, and Tiffany SIMON, were located and detained. Officers/Troopers also arrested Michael ARRINGTON and Andre GRANT on separate gun/drug charges. During the searches of Montgomery County locations, defendants Lolyta LEE and Kenneth SIMON were located. During the course of searching the aforementioned locations and vehicles the following was seized:

1. 3336 North Hope Street - Philadelphia, PA
 1. approximately 5 pounds of Marijuana (field test positive)
 2. approximately 470 grams of Methamphetamine (field test positive)
 3. approximately 12 grams of Cocaine (field test positive)
 4. approximately 145 grams of Fentanyl (field test positive)
 5. 190 Packets of THC Edibles
 6. 334 individual dosages of Heroin stamped "Venom" (field test positive)
 7. 68 individual dosages of Heroin stamped "Apple Jacks" (field test positive)
 8. 120 individual dosages of Heroin stamped "Buffalo" (field test positive)
 9. 68 individual dosages of Heroin stamped "Skechers" (field test positive)
 10. 92 individual dosages of Heroin stamped "PS5" (field test positive)
 11. Approximately \$45,000 of US Currency
 12. Glock 19 .9MM bearing Serial Number: MUN578
 13. Five 5 cellular telephones

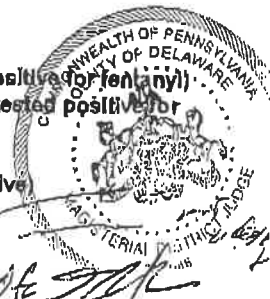
2. 2948 Kip Street - Philadelphia, PA.
 1. Indicia of ownership - LLAMAS

3. 3218 Tyson Avenue, Philadelphia PA 19149
 1. 29 packages of THC Infused edible products

4. 1422 North 52nd Street., Philadelphia PA 19131
 1. Four (4) pounds of Marijuana
 2. 16 Packets of THC Edibles
 3. 1,638 New / Unused THC Edibles Bage
 4. Glock 22 40 Caliber bearing Serial Number: BPAE148
 5. Silver/Black Taurus G2C 9MM Serial Number: TMU87326
 6. Black Taurus PT809 9MM Serial Number: TGR69871

5. 1721 Conlyn Street, Philadelphia PA 19141
 1. A large amount of US currency was found in different locations within the house totaling \$24,260.00.
 2. A digital scale w/ih used vials were found in a purse hanging on a closet door.
 3. In an additional purse hanging on the closet door a Black Smith & Wesson handgun was recovered with serial number CTM7753.
 4. A money counter
 5. Assorted drug packaging and trafficking equipment to include but not limited to: rubber bands, unused sandwich bags, green shrink wrap, 2 clear measuring cups with residue, electronic scale, coffee grinder, metal mesh strainer, and a stamp kit labeled 1(heart).

6. 3632 North 3rd Street, Philadelphia PA 19140
 1. One Ruger .22 Callbar pistol and loaded magazine (Serial Number: 380748594)
 2. One stolen Glock 19 9mm pistol and loaded magazine (Serial Number: ACDE324/NCI G244911125)
 3. 44 (approximately 44 grams) bundles of plastic bags containing a powder substance. (field tested positive for fentanyl)
 4. Approximately 27.8 grams of suspected crystal methamphetamine contained in a plastic bag. (field tested positive for methamphetamine)
 5. \$1,175.00 In United States Currency
 6. One small clear plastic bag containing suspected cocaine (approximately 0.5 grams) (field test positive)



(Handwritten Signature)
 (Signature of Affiant) [x]

From:

06/16/2021 18:54

#612 P.094/094



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 01018P718E/PA 2021-823726
Defendant Name	First HUGO	Middle	Last HYLAND

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

(IGBAL is person not to possess having a prior felony drug trafficking conviction)

- 7. 101 West Sharpnack Street, Philadelphia PA 19119.
 - 1. Pistol Sig P250- loaded with 1 chambered
 - 2. Pistol Glock 17 - stolen
 - 3. Romarm Cugir Rifle (AK style)
 - 4. Various packaging to include cocaine and cut
 - 5. In excess of 500 grams of cocaine (field test positive)
 - 6. Six (6) ounces of suspect crack cocaine (field test positive)
 - 7. Two (2) ounces suspect heroin
 - 8. Approximately 300-400 grams of cutting agents
 - 9. Approximately 30 pounds of marijuana and marijuana derivatives
 - 10. Various packaging and drug paraphernalia

- 8. 163 Grant Street, Pottstown, Montgomery County Pennsylvania
 - 1. 188 Packets of THC Edibles
 - 2. 13 THC Infused soda bottles
 - 3. Numerous THC vape cartridges
 - 4. 20 grams of marijuana
 - 5. Numerous new/unused Ziploc and vacuum sealed bags
 - 6. \$37,290 of US Currency
 - 7. Four (4) cellular telephones
 - 8. Four (4) vehicles

- 9. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania.
 - 1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweatpants belonging to Kenneth Simon.

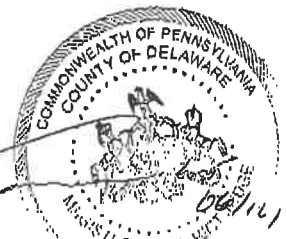
- 10. 97 South Keystone Road, Upper Darby Township, Delaware County
 - 1. One (1) clear knotted bag containing a white powdery substance of suspected cocaine (field test positive).
 - 2. One (1) clear Ziploc bag containing suspected ecstasy.

Orange Iron man stamped pill (19)
Red iron man stamped pill (4)
Blue iron man stamped pill (3)

The suspected pills were field tested via trunarc at PSP Philadelphia and found to be Diphenidine.

- 3. A silver/black Smith & Wesson SD40 VE Serial # FYB6792 containing 13 rounds of .40 caliber Blazer FMJ ammunition was located on top of the hutch.
- 4. Indicia of ownership/occupancy in name of Hugo HYLAND.
- 5. One (1) Black vacuum sealed bag containing approximately 1lb of suspected marijuana
- 6. Blazer .40 caliber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All seized items were seized and entered into evidence at the Pennsylvania State Police barracks - Troop K, Philadelphia. We certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents. Your affiants respectfully request an arrest warrant be issued.



[Handwritten signature]

(Signature of Affiant)



Magisterial District Number: **32-2-48**
 MDJ Hon. **STROHL, WALTER A**
 Address: **27 S PENNELL RD**
LIMA, PA 19037
 Telephone: **(610) 565-4110**

DEFENDANT: *(NAME and ADDRESS)*
JUWAN **ROBERT** **WOODS**
First Name Middle Name Last Name Gen
3218 TYSON AVE,
PHILADELPHIA, PA 19149

NCIC Extradition Code Type
 NCIC Extradition Code Type **1 - FELONY FULL**

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626	Request Lab Services? YES
Gender M	Date of Birth 02/07/1983	POB PA - USA	Add'l DOB	Co-Defendant? YES
Defendant Also Known As	Defendant's First Name	Middle Name	Last Name	Suffix
Race BLACK - B	Ethnicity NOT OF HISPANIC ORIGIN - N			
Hair Color BLACK - BLK	Eye Color BROWN - BRO			
DNA NO	DNA Location			Weight 240 LBS
FBI Number	MNU Number		Height 6' 00"	
Defendant Fingerprinted YES	Fingerprint Classification			

DEFENDANT VEHICLE INFORMATION

Plate #	State	HazMat	Registration Sticker (MM/YY)	Commercial Vehicle?	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
VIN	Year	Make	Model	Style	Color		NO

Office of the Attorney of 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. Pa.R.Crim.P.507.)

Name of Attorney for Commonwealth - Please Print or Type _____ (Signature of Attorney for Commonwealth) _____ (Date)
 I, **TPR. LUKE MCILVAINE** *John Thomas Kasser* **729266/13164** *#87*
 (Name of Affiant - Please Print or Type) (PSP/IMPOETC - Assigned Affiant ID Number & Badge #)
 of **PENNSYLVANIA STATE POLICE, TROOP O. EASTERN INT UNIT** *Felwa PD* **PAPSP1A00** *PAO 231200*
 (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 is 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**
 (Subdivision Code) **3218 TYSON AVE, PHILADELPHIA CITY**
 (Place-Political Subdivision)
 in **PHILADELPHIA** County **51** on or about **06/16/2021 AT APPROX. 06:00 HRS**
 (County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	First JUWAN	Middle ROBERT	Last WOODS

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.

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 0				
Lead? YES	Offense # 1	Section 911	Subsection B3	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
PennDOT DATA (if applicable)	Accident Number		Interstate Indicator NO	Safety Zone NO	Work Zone NO			

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

CORRUPT ORGANIZATIONS - EMPLOYEE

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, who was employed or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity.

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 0				
Lead? NO	Offense # 2	Section 911	Subsection B4	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
PennDOT DATA (if applicable)	Accident Number		Interstate Indicator NO	Safety Zone NO	Work Zone NO			

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

CONSP TO VIO 911B1, 911B2, 911B3

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, did conspire to violate the provisions of paragraphs (1), (2) or (3) of this subsection.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	First JUWAN	Middle ROBERT	Last WOODS

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.

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 0				
Lead? NO	Offense # 3	Section 7512	Subsection A	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code	UCR/NIBRS CC75
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

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

CRIMINAL USE OF COMMUNICATION FACILITY

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted thereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every instance where the communication facility is utilized constitutes a separate offense under this section.

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 0				
Lead? NO	Offense # 4	Section 5111	Subsection A1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC51
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

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

DEAL IN PROC UNL ACT/INTENT TO PROMOTE

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did conduct a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represented the proceeds of unlawful activity, THE DEFENDANT acted with the intent to promote the carrying on of the unlawful activity.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	First JUWAN	Middle ROBERT	Last WOODS

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.

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 0				
Lead? NO	Offense # 5	Section 780-113	Subsection A30	PA Statute (Title) 35	Count 1	Grade F	NCIC Offense Code CS13	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

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

MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act

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 0				
Lead? NO	Offense # 6	Section 780-113	Subsection A16	PA Statute (Title) 35	Count 1	Grade M	NCIC Offense Code CS13	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

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

INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	First JUWAN	Middle ROBERT	Last WOODS

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.

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 0				
Lead? NO	Offense # 7	Section 780-113	Subsection A30	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO				

Statute Description (include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:
The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A30 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act

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 0				
Lead? NO	Offense # 8	Section 780-113	Subsection A16	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO				

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:
The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	Defendant's First Name JUWAN	Middle Name ROBERT	Last Name WOODS

- 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 6.
- 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 statute 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.)

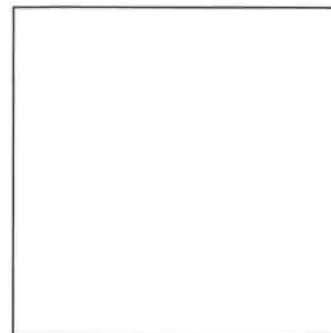
6-16-2021
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date, _____ I certify that the complaint has been properly completed and verified.
An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	First JUWAN	Middle ROBERT	Last WOODS

AFFIDAVIT of PROBABLE CAUSE

THIS IS AN OFFICE OF ATTORNEY GENERAL PROSECUTION AND THE FOLLOWING CHARGES HAVE BEEN APPROVED BY DEPUTY ATTORNEY GENERAL KARIN JUDGE.

During the month of October 2020, your affiants, members of the Pennsylvania State Police, and the Delaware County Drug Task Force initiated a narcotics investigation into the Drug Trafficking Organization of Luis LLAMAS.

At the direction of investigators and members of law enforcement confidential informants were utilized to complete five (5) controlled purchases of methamphetamine from October 2020 through March 2021, including one controlled purchase for approximately eight ounces of methamphetamine that was made in Upper Darby Township, Delaware County in December of 2020. Throughout the course of our investigation, your affiants and other members of law enforcement have confirmed that Luis LLAMAS is distributing methamphetamine, cocaine, fentanyl/heroin, marijuana and other narcotics in the City & County of Philadelphia, as well as Delaware County and Montgomery County, Pennsylvania and have identified associates within his Drug Trafficking Organization to be distributing narcotics in the City & County of Philadelphia, Delaware County and Montgomery County, Pennsylvania.

In May 2021 investigators engaged in a proactive investigation involving Non-Consensual intercepts of the Drug Trafficking Organization. During the course of the investigation Luis LLAMAS, utilizing cellular telephone numbers 215-341-4072 and 267-344-7027, was found to be distributing methamphetamine, cocaine, fentanyl/heroin, marijuana (including THC infused "edible" products) and ecstasy pills.

Over the course of our investigation your affiants identified several persons within LLAMAS' drug trafficking organization. As a result of intercepted cellular telephone communications and surveillance, your affiants identified Lolyta LEE as LLAMAS' primary source of supply for marijuana and THC infused edible products. LEE, using cellular telephone 484-547

I, TPR. LUKE MCILVAINE / DC KESSER 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.

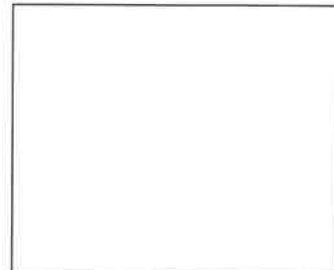
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.


(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____

_____ Date _____, Magisterial District Judge

My commission expires first Monday of January,





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	First JUWAN	Middle ROBERT	Last WOODS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

-1550, was intercepted on both LLAMAS' telephones. LEE made multiple deliveries of marijuana and THC infused product to LLAMAS at his Hope Street address and he met with LEE in Lower Merion Township, Montgomery County on May 15, 2021 to pay her \$10,000 for prior marijuana deliveries.

Hugo HYLAND, using cellular telephone (215) 459-0974, was identified as a person who LLAMAS' trusted to store quantities of controlled substances at his residence located at 97 South Keystone Road, Upper Darby Township, Delaware County. LLAMAS also relied on HYLAND to meet with source(s) of supply to pick up multi-pound quantities of methamphetamine and other drugs.

Juwan WOODS was identified as one of LLAMAS' trusted confederates. WOODS, using cellular telephone (215) 594-0974, was supplied controlled substances by LLAMAS, including cocaine. WOODS would also cook cocaine powder into cocaine base ("crack" or "hard") for LLAMAS. Your affiants ultimately conducted a Court authorized intercept of WOODS 215-594-0974 telephone facility. Interception began early June 2021. During the intercept of WOODS' phone, your affiants captured several conversations wherein WOODS made arrangements to sell both powder and cocaine base (crack or hard) to other persons as well as other controlled substances.

On June 2, 2021, a uniformed Pennsylvania State Trooper stopped a vehicle that contained a parcel. Your affiants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your affiants learned through LLAMAS' communications with others, including Kenneth SIMON, that at least part if not all of those 30 pounds were destined for LLAMAS and the members of his organization.

Kenneth SIMON and his wife Tiffany SIMON were integral parts of the LLAMAS drug trafficking organization. Kenneth and Tiffany SIMON together, and independently, came to LLAMAS' residence on North Hope Street to

conduct drug related transactions. LLAMAS would also go to the SIMONS' Conlyn Street address to engage in drug related transactions.

After June 2, 2021, LLAMAS was forced to find other sources of methamphetamine and WOODS stepped in to fill that void as WOODS had an alternate source for methamphetamine. WOODS would contact his source on LLAMAS' behalf and WOODS would coordinate multi-pound methamphetamine sales to LLAMAS. LLAMAS would often send or meet HYLAND with WOODS to pick up the methamphetamine. LLAMAS also relied upon HYLAND to deliver multi-pound quantities to distributors within the LLAMAS drug trafficking organization.

Zahid IGBAL, using cellular telephone facility 267-319-2908, was identified as one of LLAMAS' distributors for heroin/fentanyl and methamphetamine. IGBAL would come to LLAMAS' Hope Street address and other locations, to meet LLAMAS to pick up supplies of fentanyl/heroin and other controlled substances for distribution to other persons.

On June 15, 2021 your affiants prepared search warrants for the following locations and vehicles within the City & County of Philadelphia, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 3336 North Hope Street - Philadelphia, PA
2. 2948 Kip Street - Philadelphia, PA.
3. 3218 Tyson Avenue, Philadelphia PA 19149
4. 1422 North 52nd Street., Philadelphia PA 19131.
5. 1721 Conlyn Street, Philadelphia PA 19141
6. 3632 North 3rd Street, Philadelphia PA 19140
7. 101 West Sharpnack Street, Philadelphia PA 19119.
8. 2015 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1FD006533)


(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	First JUWAN	Middle ROBERT	Last WOODS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

9. 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1250 VIN (1HGCV3F94LA004266)
10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900)
11. 2017 Black Nissan Maxima PA reg KXG-4899 VIN (1N4AA6AP5HC445219)
12. 2021 Grey Toyota Tundra ZPY6195 VIN (5TFAY5F10MX007232)
13. 2017 Silver Ford Taurus PA registration LGP8637 VIN (WA1LGAFE1FD006533)

The search warrants were presented to and approved by Philadelphia County Common Pleas Judge Honorable Anne Marie Coyle on June 15, 2021

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Upper Darby Township, Delaware County, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 97 South Keystone Road, Upper Darby Township, Delaware County, PA
2. 2003 Maroon Ford F-150 PA registration ZMK-4067 VIN(1FTRX18W33NA09123)

The search warrants were presented to and approved by the Honorable Kevin F. Kelly, President Judge of the Common Pleas Court of Delaware County.

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Pottstown Borough and Cheltenham Township, Montgomery, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL

1. 163 Grant Street, Pottstown, Montgomery County Pennsylvania
2. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania

The search warrants were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Demchick-Alloy on June 15, 2021

On June 16, 2021 shortly after 6:00 A.M., members of the Pennsylvania State Police, Delaware County Drug Task Force, Montgomery County Detectives, and Drug Enforcement Administration executed the aforementioned search warrants. During the search warrant executions in the City & County of Philadelphia, Montgomery County and Delaware County, Pennsylvania, Luis LLAMAS, Juwan WOODS, Zahid IGBAL, and Tiffany SIMON, were located and detained. Officers/Troopers also arrested Michael ARRINGTON and Andre GRANT on separate gun/drug charges.

During the searches of Montgomery County locations, defendants Lolyta LEE and Kenneth SIMON were located. During the course of searching the aforementioned locations and vehicles the following was seized:

1. 3336 North Hope Street - Philadelphia, PA
 1. approximately 5 pounds of Marijuana (field test positive)
 2. approximately 470 grams of Methamphetamine (field test positive)
 3. approximately 12 grams of Cocaine (field test positive)
 4. approximately 145 grams of Fentanyl (field test positive)
 5. 190 Packets of THC Edibles
 6. 334 individual dosages of Heroin stamped "Venom" (field test positive)
 7. 68 individual dosages of Heroin stamped "Apple Jacks"(field test positive)
 8. 120 individual dosages of Heroin stamped "Buffalo" (field test positive)
 9. 68 individual dosages of Heroin stamped "Skechers" (field test positive)
 10. 92 individual dosages of Heroin stamped "PS5" (field test positive)
 11. Approximately \$45,000 of US Currency
 12. Glock 19 .9MM bearing Serial Number: MUN578
 13. Five 5 cellular telephones
2. 2948 Kip Street - Philadelphia, PA.
 1. Indicia of ownership - LLAMAS
3. 3218 Tyson Avenue, Philadelphia PA 19149
 1. 29 packages of THC infused edible products



(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	First JUWAN	Middle ROBERT	Last WOODS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

4. 1422 North 52nd Street., Philadelphia PA 19131
 1. Four (4) pounds of Marijuana
 2. 15 Packets of THC Edibles
 3. 1,638 New / Unused THC Edibles Bags
 4. Glock 22 40 Caliber bearing Serial Number: BPAE148
 5. Silver/Black Taurus G2C 9MM Serial Number: TMU87326
 6. Black Taurus PT809 9MM Serial Number: TGR69871

5. 1721 Conlyn Street, Philadelphia PA 19141
 1. A large amount of US currency was found in different locations within the house totaling \$24,260.00.
 2. A digital scale with used vials were found in a purse hanging on a closet door.
 3. In an additional purse hanging on the closet door a Black Smith & Wesson handgun was recovered with serial number CTM7753.
 4. A money counter
 5. Assorted drug packaging and trafficking equipment to include but not limited to: rubber bands, unused sandwich bags, green shrink wrap, 2 clear measuring cups with residue, electronic scale, coffee grinder, metal mesh strainer, and a stamp kit labeled 1(heart).

6. 3632 North 3rd Street, Philadelphia PA 19140
 1. One Ruger .22 Caliber pistol and loaded magazine (Serial Number: 380746594)
 2. One stolen Glock 19 9mm pistol and loaded magazine (Serial Number: ACDE324/NCI G244911125)
 3. 44 (approximately 44 grams) bundles of plastic bags containing a powder substance. (field tested positive for fentanyl)
 4. Approximately 27.8 grams of suspected crystal methamphetamine contained in a plastic bag. (field tested positive for methamphetamine)
 5. \$1,175.00 in United States Currency
 6. One small clear plastic bag containing suspected cocaine (approximately 0.5 grams) (field test positive)

(IGBAL is person not to possess having a prior felony drug trafficking conviction)

7. 101 West Sharpnack Street, Philadelphia PA 19119.
 1. Pistol Sig P250- loaded with 1 chambered
 2. Pistol Glock 17 - stolen
 3. Romarm Cugir Rifle (AK style)
 4. Various packaging to include cocaine and cut
 5. In excess of 500 grams of cocaine (field test positive)
 6. Six (6) ounces of suspect crack cocaine (field test positive)
 7. Two (2) ounces suspect heroin
 8. Approximately 300-400 grams of cutting agents
 9. Approximately 30 pounds of marijuana and marijuana derivatives
 10. Various packaging and drug paraphernalia

8. 163 Grant Street, Pottstown, Montgomery County Pennsylvania
 1. 188 Packets of THC Edibles
 2. 13 THC infused soda bottles
 3. Numerous THC vape cartridges
 4. 20 grams of marijuana
 5. Numerous new/unused Ziploc and vacuum sealed bags
 6. \$37,290 of US Currency
 7. Four (4) cellular telephones
 8. Four (4) vehicles

9. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania.
 1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweatpants belonging to Kenneth Simon.


(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400522-3	Complaint/Incident Number O1018P721E/PA 2021-823626
Defendant Name	First JUWAN	Middle ROBERT	Last WOODS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

10. 97 South Keystone Road, Upper Darby Township, Delaware County
1. One (1) clear knotted bag containing a white powdery substance of suspected cocaine (field test positive).
 2. One (1) clear Ziploc bag containing suspected ecstasy.
 - Orange iron man stamped pill (19)
 - Red iron man stamped pill (4)
 - Blue iron man stamped pill (3)
- The suspected pills were field tested via trunarc at PSP Philadelphia and found to be Diphenidine.
3. A silver/black Smith & Wesson SD40 VE Serial # FYB6792 containing 13 rounds of .40 caliber Blazer FMJ ammunition was located on top of the hutch.
 4. Indicia of ownership/occupancy in name of Hugo HYLAND.
 5. One (1) Black vacuum sealed bag containing approximately 1lb of suspected marijuana
 6. Blazer .40 caliber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All seized items were seized and entered into evidence at the Pennsylvania State Police barracks – Troop K, Philadelphia. We certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.



 (Signature of Affiant)

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: MONTGOMERY



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 32-24B
MDJ Hon. STROHL, WALTER A

Address: 27 S PENNELL RD
LIMA, PA 18037
Telephone: (610) 686-4110

DEFENDANT: (NAME and ADDRESS)

KENNETH I SIMON
First Name Middle Name Last Name Gen
208 PARKVIEW RD,
CHELTENHAM, PA 19012

NCIC Extradition Code Type

NCIC Extradition Code Type 1 - FELONY FULL

DEFENDANT IDENTIFICATION INFORMATION

Docket Number 21-157-21	Date Filed 06/16/21	OTN/Live Scan Number X400518-6	Complaint/Incident Number O1018P719E/PA 2021-823302	Request Lab Services? YES
Gender M	Date of Birth 08/10/1977	POB PA - USA	Add'l DOB	Co-Defendant? YES
Defendant Also Known As	Defendant's First Name	Middle Name	Last Name	Suffix
Race BLACK - B	Ethnicity NOT OF HISPANIC ORIGIN - N			
Hair Color BLACK - BLK	Eye Color BROWN - BRO			
DNA NO	DNA Location			Weight 140 LBS
FBI Number	MNU Number			Height 5' 06"
Defendant Fingerprinted YES	Fingerprint Classification			

DEFENDANT VEHICLE INFORMATION

Plate #	State	HazMat	Registration Sticker (MM/YY)	Commercial Vehicle?	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
VIN	Year	Make	Model	Style	Color		NO

Office of the Attorney of 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. Pa.R.Crim.P.507.)

Name of Attorney for Commonwealth - Please Print or Type (Signature of Attorney for Commonwealth) (Date)

I, TPR LUKE MCILVAINE / Luke Thomas Kestner 728286/13164 / #897
(Name of Affiant - Please Print or Type) (PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of PENNSYLVANIA STATE POLICE, TROOP O, EASTERN INT UNIT / Federal PA
(Identify Department or Agency Represented and Political Subdivision) PAPSP1A00 / PA0231200
(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 is 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: 102
(Subdivision Code) 2138 MATHER WAY, CHELTENHAM
(Place-Political Subdivision)

In MONTGOMERY County 46 on or about 6/16/2021 AT APPROX. 06:00 HRS
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400518-6	Complaint/Incident Number 01018P719E/PA 2021-823302
Defendant Name	First KENNETH	Middle I	Last SIMON

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.

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 0				
Lead? YES	Offense # 1	Section 911	Subsection B1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	
Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS								

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did receive income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise.

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 0				
Lead? NO	Offense # 2	Section 7512	Subsection A	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code	UCR/NIBRS CC75
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	
Statute Description (include the name of statute or ordinance): CRIMINAL USE OF COMMUNICATION FACILITY								

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted thereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every instance where the communication facility is utilized constitutes a separate offense under this section.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400518-6	Complaint/Incident Number O1018P719E/PA 2021-823302
Defendant Name	First KENNETH	Middle I	Last SIMON

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.

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 0				
Lead? NO	Offense # 3	Section 5111	Subsection A1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC51
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO				

Statute Description (Include the name of statute or ordinance):
DEAL IN PROC UNL ACT/INTENT TO PROMOTE

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did conduct a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represented the proceeds of unlawful activity, THE DEFENDANT acted with the intent to promote the carrying on of the unlawful activity.

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 0				
Lead? NO	Offense # 4	Section 780-113	Subsection A30	PA Statute (Title) 35	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO				

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

MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400618-8	Complaint/Incident Number 01018P719E/PA 2021-823302
Defendant Name	First KENNETH	Middle I	Last SIMON

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.

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 0				
Lead? NO	Offense # 5	Section 780-113	Subsection A16	PA Statute (Title) 35	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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 0				
Lead? NO	Offense # 8	Section 780-113	Subsection A30	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A30 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400518-6	Complaint/Incident Number O1018P719E/PA 2021-823302
Defendant Name	First KENNETH	Middle I	Last SIMON

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.

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 0				
Lead? NO	Offense # 7	Section 780-113	Subsection A16	PA Statute (Title) 18	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:

The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400518-6	Complaint/Incident Number O1018P719E/PA 2021-823302
Defendant Name	Defendant's First Name KENNETH	Middle Name I	Last Name SIMON

- 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 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 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 statute 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.)

6-16-2021
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date, 06/16/21 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.

32-1-31
(Magisterial District Court Number)

[Signature]
(Issuing Authority)

Philip S. Turner
Magisterial District Judge





POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400518-6	Complaint/Incident Number O1018P719E/PA 2021-823302
Defendant Name	First KENNETH	Middle I	Last SIMON

AFFIDAVIT of PROBABLE CAUSE

THIS IS AN OFFICE OF ATTORNEY GENERAL PROSECUTION AND THE FOLLOWING CHARGES HAVE BEEN APPROVED BY DEPUTY ATTORNEY GENERAL KARIN JUDGE.

During the month of October 2020, your affiants, members of the Pennsylvania State Police, and the Delaware County Drug Task Force Initiated a narcotics investigation into the Drug Trafficking Organization of Luis LLAMAS. At the direction of investigators and members of law enforcement confidential informants were utilized to complete five (5) controlled purchases of methamphetamine from October 2020 through March 2021, including one controlled purchase for approximately eight ounces of methamphetamine that was made in Upper Darby Township, Delaware County in December of 2020. Throughout the course of our investigation, your affiants and other members of law enforcement have confirmed that Luis LLAMAS is distributing methamphetamine, cocaine, fentanyl/heroin, marijuana and other narcotics in the City & County of Philadelphia, as well as Delaware County and Montgomery County, Pennsylvania and have identified associates within his Drug Trafficking Organization to be distributing narcotics in the City & County of Philadelphia, Delaware County and Montgomery County, Pennsylvania.

In May 2021 investigators engaged in a proactive investigation involving Non-Consensual intercepts of the Drug Trafficking Organization. During the course of the investigation Luis LLAMAS, utilizing cellular telephone numbers 215-341-4072 and 267-344-7027, was found to be distributing methamphetamine, cocaine, fentanyl/heroin, marijuana (including THC infused "edible" products) and ecstasy pills.

Over the course of our investigation your affiants identified several persons within LLAMAS' drug trafficking organization. As a result of intercepted cellular telephone communications and surveillance, your affiants identified Lolyta LEE as LLAMAS' primary source of supply for marijuana and THC infused edible products. LEE, using cellular telephone 484-547

I, TPR. LUKE MCILVAINE /ok Kasso 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.

[Handwritten Signature]
(Signature of Affiant)

Sworn to me and subscribed before me this 16th day of JUNE 2021

Date *[Handwritten Signature]*

My commission expires first Monday of January, 2022





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400618-8	Complaint/Incident Number O1018P719E/PA 2021-823302
Defendant Name	First KENNETH	Middle I	Last SIMON

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

-1550, was intercepted on both LLAMAS' telephones. LEE made multiple deliveries of marijuana and THC infused product to LLAMAS at his Hope Street address and he met with LEE in Lower Marion Township, Montgomery County on May 15, 2021 to pay her \$10,000 for prior marijuana deliveries.

Hugo HYLAND, using cellular telephone (215) 459-0974, was identified as a person who LLAMAS' trusted to store quantities of controlled substances at his residence located at 97 South Keystone Road, Upper Darby Township, Delaware County. LLAMAS also relied on HYLAND to meet with source(s) of supply to pick up multi-pound quantities of methamphetamine and other drugs.

Juwan WOODS was identified as one of LLAMAS' trusted confederates. WOODS, using cellular telephone (215) 594-0974, was supplied controlled substances by LLAMAS, including cocaine. WOODS would also cook cocaine powder into cocaine base ("crack" or "hard") for LLAMAS. Your affiants ultimately conducted a Court authorized intercept of WOODS 215-594-0974 telephone facility. Interception began early June 2021. During the intercept of WOODS' phone, your affiants captured several conversations wherein WOODS made arrangements to sell both powder and cocaine base (crack or hard) to other persons as well as other controlled substances.

On June 2, 2021, a uniformed Pennsylvania State Trooper stopped a vehicle that contained a parcel. Your affiants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your affiants learned through LLAMAS' communications with others, including Kenneth SIMON, that at least part if not all of those 30 pounds were destined for LLAMAS and the members of his organization.

Kenneth SIMON and his wife Tiffany SIMON were integral parts of the LLAMAS drug trafficking organization. Kenneth and Tiffany SIMON together, and independently, came to LLAMAS' residence on North Hope Street to

conduct drug related transactions. LLAMAS would also go to the SIMONS' Conlyn Street address to engage in drug related transactions.

After June 2, 2021, LLAMAS was forced to find other sources of methamphetamine and WOODS stepped in to fill that void as WOODS had an alternate source for methamphetamine. WOODS would contact his source on LLAMAS' behalf and WOODS would coordinate multi-pound methamphetamine sales to LLAMAS. LLAMAS would often send or meet HYLAND with WOODS to pick up the methamphetamine. LLAMAS also relied upon HYLAND to deliver multi-pound quantities to distributors within the LLAMAS drug trafficking organization.

Zahid IGBAL, using cellular telephone facility 267-319-2908, was identified as one of LLAMAS' distributors for heroin/fentanyl and methamphetamine. IGBAL would come to LLAMAS' Hope Street address and other locations, to meet LLAMAS to pick up supplies of fentanyl/heroin and other controlled substances for distribution to other persons.

On June 15, 2021 your affiants prepared search warrants for the following locations and vehicles within the City & County of Philadelphia, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 3336 North Hope Street - Philadelphia, PA
2. 2948 Kip Street - Philadelphia, PA.
3. 3218 Tyson Avenue, Philadelphia PA 19149
4. 1422 North 52nd Street, Philadelphia PA 19131.
5. 1721 Conlyn Street, Philadelphia PA 19141
6. 3632 North 3rd Street, Philadelphia PA 19140
7. 101 West Sharpnack Street, Philadelphia PA 19119.
8. 2015 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1FD006533)



[Handwritten signature]
6/16/21
[Handwritten signature]

(Signature of Affiant) [*]



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400518-6	Complaint/Incident Number O1Q18P719E/PA 2021-823302
Defendant Name	First KENNETH	Middle I	Last SIMON

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

- 9. 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1250 VIN (1HGCV3F94LA004266)
- 10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900)
- 11. 2017 Black Nissan Maxima PA reg KXG-4889 VIN (1N4AA6AP5HC445219)
- 12. 2021 Grey Toyota Tundra ZPY6196 VIN (5TFAY5F10MX007232)
- 13. 2017 Silver Ford Taurus PA registration LGP8837 VIN (WA1LGAFE1FD006533)

The search warrants were presented to and approved by Philadelphia County Common Pleas Judge Honorable Anne Marie Coyle on June 15, 2021

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Upper Darby Township, Delaware County, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

- 1. 97 South Keystone Road, Upper Darby Township, Delaware County, PA
- 2. 2003 Maroon Ford F-160 PA registration ZMK-4067 VIN(1FTRX18W33NA09123)

The search warrants were presented to and approved by the Honorable Kevin F. Kelly, President Judge of the Common Pleas Court of Delaware County.

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Pottstown Borough and Cheltenham Township, Montgomery, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL

- 1. 163 Grant Street, Pottstown, Montgomery County Pennsylvania
- 2. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania

The search warrants were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Demchick-Alloy on June 15, 2021

On June 15, 2021 shortly after 6:00 A.M., members of the Pennsylvania State Police, Delaware County Drug Task Force, Montgomery County Detectives, and Drug Enforcement Administration executed the aforementioned search warrants. During the search warrant executions in the City & County of Philadelphia, Montgomery County and Delaware County, Pennsylvania, Luis LLAMAS, Juwan WOODS, Zahid IGBAL, and Tiffany SIMON, were located and detained. Officers/Troopers also arrested Michael ARRINGTON and Andre GRANT on separate gun/drug charges.

During the searches of Montgomery County locations, defendants Lolyta LEE and Kenneth SIMON were located. During the course of searching the aforementioned locations and vehicles the following was seized:

- 1. 3336 North Hope Street - Philadelphia, PA
 - 1. approximately 5 pounds of Marijuana (field test positive)
 - 2. approximately 470 grams of Methamphetamine (field test positive)
 - 3. approximately 12 grams of Cocaine (field test positive)
 - 4. approximately 145 grams of Fentanyl (field test positive)
 - 5. 190 Packets of THC Edibles
 - 6. 334 Individual dosages of Heroin stamped "Venom" (field test positive)
 - 7. 68 Individual dosages of Heroin stamped "Apple Jacks" (field test positive)
 - 8. 120 Individual dosages of Heroin stamped "Buffalo" (field test positive)
 - 9. 68 Individual dosages of Heroin stamped "Skechers" (field test positive)
 - 10. 82 Individual dosages of Heroin stamped "PS5" (field test positive)
 - 11. Approximately \$45,000 of US Currency
 - 12. Glock 19 .9MM bearing Serial Number: MUN578
 - 13. Five 5 cellular telephones
- 2. 2948 Kip Street - Philadelphia, PA.
 - 1. Indicia of ownership - LLAMAS
- 3. 3218 Tyson Avenue, Philadelphia PA 19149
 - 1. 29 packages of THC infused edible products



[Handwritten signature]
(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400518-6	Complaint/Incident Number 01018P719E/PA 2021-823302
Defendant Name	First KENNETH	Middle I	Last SIMON

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

4. 1422 North 52nd Street, Philadelphia PA 19131

1. Four (4) pounds of Marijuana
2. 15 Packets of THC Edibles
3. 1,838 New / Unused THC Edibles Bags
4. Glock 22 40 Callber bearing Serial Number: BPAE148
5. Silver/Black Taurus G2C 9MM Serial Number: TMUB7326
6. Black Taurus PT809 9MM Serial Number: TGR69871

5. 1721 Conlyn Street, Philadelphia PA 19141

1. A large amount of US currency was found in different locations within the house totalling \$24,260.00.
2. A digital scale with used vials were found in a purse hanging on a closet door.
3. In an additional purse hanging on the closet door a Black Smith & Wesson handgun was recovered with serial number CTM7763.
4. A money counter
5. Assorted drug packaging and trafficking equipment to include but not limited to: rubber bands, unused sandwich bags, green shrink wrap, 2 clear measuring cups with residue, electronic scale, coffee grinder, metal mesh strainer, and a stamp kit labeled 1(heart).

6. 3632 North 3rd Street, Philadelphia PA 19140

1. One Ruger .22 Callber pistol and loaded magazine (Serial Number: 380748594)
2. One stolen Glock 19 9mm pistol and loaded magazine (Serial Number: ACDE324/NCI G24491125)
3. 44 (approximately 44 grams) bundles of plastic bags containing a powder substance. (field tested positive for fentanyl)
4. Approximately 27.8 grams of suspected crystal methamphetamine contained in a plastic bag. (field tested positive for methamphetamine)
5. \$1,176.00 in United States Currency
6. One small clear plastic bag containing suspected cocaine (approximately 0.5 grams) (field test positive)

(IGBAL is person not to possess having a prior felony drug trafficking conviction)

7. 101 West Sharpnack Street, Philadelphia PA 19119.

1. Pistol Sig P250- loaded with 1 chambered
2. Pistol Glock 17 - stolen
3. Romarm Cugir Rifle (AK style)
4. Various packaging to include cocaine and cut
5. In excess of 500 grams of cocaine (field test positive)
6. Six (6) ounces of suspect crack cocaine (field test positive)
7. Two (2) ounces suspect heroin
8. Approximately 300-400 grams of cutting agents
9. Approximately 30 pounds of marijuana and marijuana derivatives
10. Various packaging and drug paraphernalia

8. 163 Grant Street, Pottstown, Montgomery County Pennsylvania

1. 188 Packets of THC Edibles
2. 13 THC Infused soda bottles
3. Numerous THC vape cartridges
4. 20 grams of marijuana
5. Numerous new/unused Ziploc and vacuum sealed bags
6. \$37,290 of US Currency
7. Four (4) cellular telephones
8. Four (4) vehicles

9. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania.

1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweatpants belonging to Kenneth Simon.



[Handwritten signatures and initials]



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400518-6	Complaint/Incident Number O1018P719E/PA 2021-823302
Defendant Name	First KENNETH	Middle I	Last SIMON

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

10. 97 South Keystone Road, Upper Darby Township, Delaware County

- 1. One (1) clear knotted bag containing a white powdery substance of suspected cocaine (field test positive).
- 2. One (1) clear Ziploc bag containing suspected ecstasy.

Orange iron man stamped pill (19)

Red iron man stamped pill (4)

Blue iron man stamped pill (3)

The suspected pills were field tested via trunarc at PSP Philadelphia and found to be Diphenidne.

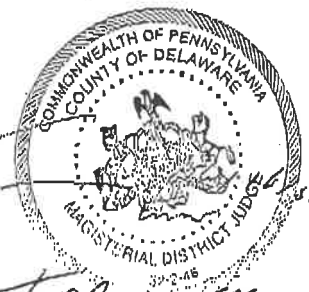
3. A silver/black Smith & Wesson SD40 VE Serial # FYB6792 containing 13 rounds of .40 caliber Blazer FMJ ammunition was located on top of the hutch.

4. Indicia of ownership/occupancy in name of Hugo HYLAND.

5. One (1) Black vacuum sealed bag containing approximately 1lb of suspected marijuana

6. Blazer .40 caliber FMJ ammunition was located on top of the kitchen cabinet above the microwaves. (32 rounds)

All seized items were seized and entered into evidence at the Pennsylvania State Police barracks – Troop K, Philadelphia. We certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.



[Handwritten signature]

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: PHILADELPHIA



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: **32-Z-48**
 MDJ Hon. **STROHL, WALTER A**
 Address: **27 S PENNELL RD**
LIMA, PA 19037
 Telephone: **(610) 665-4110**

DEFENDANT: (NAME and ADDRESS)
LOLYTA R LEE
 First Name Middle Name Last Name Gen
183 GRANT ST,
POTTSTOWN, PA 18464

NCIC Extradition Code Type

NCIC Extradition Code Type 1 - FELONY FULL

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-160-21	Date Filed	OTN/Live Scan Number X400528-2	Complaint/Incident Number 01018P7140/PA 2021-823560	Request Lab Services? YES
Gender F	Date of Birth 10/05/1963	POB PA - USA	Add'l DOB	Co-Defendant? YES
Defendant Also Known As	Defendant's First Name	Middle Name	Last Name	Suffix
Race BLACK - B	Ethnicity NOT OF HISPANIC ORIGIN - N			
Hair Color BLACK - BLK	Eye Color BROWN - BRO			
DNA NO	DNA Location		Weight 170 LBS	
FBI Number	MNU Number		Height 6' 08"	
Defendant Fingerprinted YES	Fingerprint Classification			

DEFENDANT VEHICLE INFORMATION

Plate #	State	HazMat	Registration Sticker (MM/YY)	Commercial Vehicle?	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
VIN	Year	Make	Model	Style	Color		NO

Office of the Attorney of 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. Pa.R.Crim.P.507.)

Name of Attorney for Commonwealth - Please Print or Type (Signature of Attorney for Commonwealth) (Date)
 I, **TPR LUKE MCILVAINE / s/ Thomas Kesser** **723286/13184 / H87**
 (Name of Affiant - Please Print or Type) (PSP/MPOETC Assigned Affiant ID Number & Badge #)
 of **PENNSYLVANIA STATE POLICE TROOP O. EASTERN INT UNIT / Filad PA PD** **PAPSP1A00 / PA 0271200**
 (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 is 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**
 (Subdivision Code) **101 W SHARPBACK ST PHILADELPHIA CITY**
 (Place-Political Subdivision)

in **PHILADELPHIA** County **51** on or about **6/16/2021 AT APPROX. 06:00 HRS**
 (County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 0101BP714D/PA 2021-823660
Defendant Name	First LOLYTA	Middle R	Last LEE

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.

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 0				
Lead? NO	Offense # 1	Section 780-113	Subsection A30	PA Statute (Title) 36	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act

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 0				
Lead? NO	Offense # 2	Section 780-113	Subsection A16	PA Statute (Title) 35	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 01018P714D/PA 2021-823660
Defendant Name	First LOLYTA	Middle R	Last LEE

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.

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 0				
Lead? YES	Offense # 3	Section 911	Subsection B3	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code CC91	UCR/NIBRS CC91
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

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

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, who was employed or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity.

Inchoate Offense	<input checked="" 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 0				
Lead? NO	Offense # 4	Section 780-113	Subsection A32	PA Statute (Title) 35	Count 1	Grade M	NCIC Offense Code CS13	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
USE/POSS OF DRUG PARAPH

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did use, or possess with intent to use, drug paraphernalia, namely, (DESCRIBE PARAPHERNALIA), for the purpose of planting, propagating, cultivating, growing, harvesting, manufacturing, compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, injecting, ingesting, inhaling or otherwise introducing into the human body a controlled substance, that is to say the DEFENDANT did possess the above-described paraphernalia for the purposes of (LIST ONE OR MORE OF THE ABOVE REASONS), in violation of Section 780-113(a)(32) of the PA Controlled Substance, Drug, Device and Cosmetic Act.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 01018F714D/PA 2021-823660
Defendant Name	First LOLYTA	Middle R	Last LEE

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.

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 0				
Lead? NO	Offense # 5	Section 6111	Subsection A1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code CC51	UCR/NIBRS CC51
PennDOT DATA (If applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
DEAL IN PROC UNL ACT/INTENT TO PROMOTE

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did conduct a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represented the proceeds of unlawful activity, THE DEFENDANT acted with the intent to promote the carrying on of the unlawful activity.

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 0				
Lead? NO	Offense # 6	Section 780-113	Subsection A30	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:
The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A30 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complain/Incident Number 01018P714D/PA 2021-823660
Defendant Name	First LOLYTA	Middle R	Last LEE

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.

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 0				
Lead? NO	Offense # 7	Section 7512	Subsection A	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code CC75	UCR/NIBRS CC75
PennDOT DATA (if applicable)			Accident Number	Interstate Indicator NO	Safety Zone NO		Work Zone NO	

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

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted (hereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every instance where the communication facility is utilized constitutes a separate offense under this section.

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				
Lead? NO	Offense # 8	Section 6106	Subsection A1	PA Statute (Title) 18	Count 3	Grade F1	NCIC Offense Code	UCR/NIBRS 1B
PennDOT DATA (if applicable)			Accident Number	Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (Include the name of statute or ordinance):
POSSESSION OF FIREARM PROHIBITED

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, being a person who has been convicted of an offense enumerated in subsection (b), within or without this Commonwealth, regardless of the length of sentence or whose conduct meets the criteria in subsection (c) did possess, use, control, sell, transfer or manufacture or obtain a license to possess, use, control, sell, transfer or manufacture a firearm in this Commonwealth



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P714D/PA 2021-823660
Defendant Name	First LOLYTA	Middle R	Last LEE

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.

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				
Lead? NO	Offense # 9	Section 780-113	Subsection A16	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code C513	UCR/NIBRS C513
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG.

Acts of the accused associated with this Offense:

The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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				
Lead? NO	Offense # 10	Section 911	Subsection B4	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CCB1
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
CONSP TO VIO 911B1, 911B2, 911B3

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, did conspire to violate the provisions of paragraphs (1), (2) or (3) of this subsection.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 01018P714D/PA 2021-623660
Defendant Name	First LOLYTA	Middle R	Last LEE

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.

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				
Lead? NO	Offense # 11	Section 6108	Subsection A1	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code	UCR/NIBRS CC61
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (Include the name of statute or ordinance):
FIREARMS NOT TO BE CARRIED W/O LICENSE

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did carry a firearm, namely, glock 17, handgun, sig p250 handgun, 7.62 rifle, in a vehicle or concealed on or about his person, while outside his place of abode or fixed place of business, w/o a valid and lawfully issued license, in violation of this chapter of the PA Crimes Code.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P714D/PA 2021-823660
Defendant Name	Defendant's First Name LOLYTA	Middle Name R	Last Name LEE

- 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 2
- 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 statute 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.)

6-16-2021

(Date)

[Signature]

(Signature of Affiant)

AND NOW, on this date, 06/16/21 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.

32-1-31

(Magisterial District Court Number)

[Signature]

(Issuing Authority)

Philip S. Turan, Jr.





POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P714D/PA 2021-823660
Defendant Name	First LOLYTA	Middle R	Last LEE

AFFIDAVIT of PROBABLE CAUSE

THIS IS AN OFFICE OF ATTORNEY GENERAL PROSECUTION AND THE FOLLOWING CHARGES HAVE BEEN APPROVED BY DEPUTY ATTORNEY GENERAL KARIN JUDGE.

During the month of October 2020, your affiants, members of the Pennsylvania State Police, and the Delaware County Drug Task Force initiated a narcotics investigation into the Drug Trafficking Organization of Luis LLAMAS.

At the direction of investigators and members of law enforcement confidential informants were utilized to complete five (5) controlled purchases of methamphetamine from October 2020 through March 2021, including one controlled purchase for approximately eight ounces of methamphetamine that was made in Upper Darby Township, Delaware County in December of 2020. Throughout the course of our investigation, your affiants and other members of law enforcement have confirmed that Luis LLAMAS is distributing methamphetamine, cocaine, fentanyl/heroin, marijuana and other narcotics in the City & County of Philadelphia, as well as Delaware County and Montgomery County, Pennsylvania and have identified associates within his Drug Trafficking Organization to be distributing narcotics in the City & County of Philadelphia, Delaware County and Montgomery County, Pennsylvania.

In May 2021 investigators engaged in a proactive investigation involving Non-Consensual Intercepts of the Drug Trafficking Organization. During the course of the investigation Luis LLAMAS, utilizing cellular telephone numbers 215-341-4072 and 267-344-7027, was found to be distributing methamphetamine, cocaine, fentanyl/heroin, marijuana (including THC infused "edible" products) and ecstasy pills.

Over the course of our investigation your affiants identified several persons within LLAMAS' drug trafficking organization. As a result of intercepted cellular telephone communications and surveillance, your affiants identified Lolita LEE as LLAMAS' primary source of supply for marijuana and THC infused edible products. LEE, using cellular telephone 484-547

I, TPR. LUKE MCILVAINE / *of Karsar* 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.

Moyle / of Karsar
(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____

_____ Date _____

My commission expires first Monday of January,





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P714D/PA 2021-823860	
Defendant Name	First LOLYTA	Middle R	Last LEE	

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

-1550, was intercepted on both LLAMAS' telephones. LEE made multiple deliveries of marijuana and THC infused product to LLAMAS at his Hope Street address and he met with LEE in Lower Merion Township, Montgomery County on May 15, 2021 to pay her \$10,000 for prior marijuana deliveries.

Hugo HYLAND, using cellular telephone (215) 459-0974, was identified as a person who LLAMAS' trusted to store quantities of controlled substances at his residence located at 97 South Keystone Road, Upper Darby Township, Delaware County. LLAMAS also relied on HYLAND to meet with source(s) of supply to pick up multi-pound quantities of methamphetamines and other drugs.

Juwan WOODS was identified as one of LLAMAS' trusted confederates. WOODS, using cellular telephone (215) 594-0974, was supplied controlled substances by LLAMAS, including cocaine. WOODS would also cook cocaine powder into cocaine base ("crack" or "hard") for LLAMAS. Your affiants ultimately conducted a Court authorized intercept of WOODS 215-594-0974 telephone facility. Interception began early June 2021. During the intercept of WOODS' phone, your affiants captured several conversations wherein WOODS made arrangements to sell both powder and cocaine base (crack or hard) to other persons as well as other controlled substances.

On June 2, 2021, a uniformed Pennsylvania State Trooper stopped a vehicle that contained a parcel. Your affiants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your affiants learned through LLAMAS' communications with others, including Kenneth SIMON, that at least part if not all of those 30 pounds were destined for LLAMAS and the members of his organization.

Kenneth SIMON and his wife Tiffany SIMON were integral parts of the LLAMAS drug trafficking organization. Kenneth and Tiffany SIMON together, and independently, came to LLAMAS' residence on North Hope Street to

conduct drug related transactions. LLAMAS would also go to the SIMONS' Conlyn Street address to engage in drug related transactions.

After June 2, 2021, LLAMAS was forced to find other sources of methamphetamine and WOODS stepped in to fill that void as WOODS had an alternate source for methamphetamine. WOODS would contact his source on LLAMAS' behalf and WOODS would coordinate multi-pound methamphetamine sales to LLAMAS. LLAMAS would often send or meet HYLAND with WOODS to pick up the methamphetamine. LLAMAS also relied upon HYLAND to deliver multi-pound quantities to distributors within the LLAMAS drug trafficking organization.

Zahid IGBAL, using cellular telephone facility 267-319-2908, was identified as one of LLAMAS' distributors for heroin/fentanyl and methamphetamine. IGBAL would come to LLAMAS' Hope Street address and other locations, to meet LLAMAS to pick up supplies of fentanyl/heroin and other controlled substances for distribution to other persons.

On June 15, 2021 your affiants prepared search warrants for the following locations and vehicles within the City & County of Philadelphia, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 3336 North Hope Street - Philadelphia, PA
2. 2948 Kip Street - Philadelphia, PA.
3. 3218 Tyson Avenue, Philadelphia PA 19149
4. 1422 North 52nd Street., Philadelphia PA 19131.
5. 1721 Conlyn Street, Philadelphia PA 19141
6. 3632 North 3rd Street, Philadelphia PA 19140
7. 101 West Sharpnack Street, Philadelphia PA 19119.
8. 2015 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1FD006533)
9. 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1250 VIN (1HGCV3F93LA004366)
10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900)
11. 2017 Black Nissan Maxima PA reg KXG-4899 VIN (1N4AA6AP5HC445219)


 (Signature of Affiant)





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P714D/PA 2021-823660
Defendant Name	First LOLYTA	Middle R	Last LEE

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

The search warrants were presented to and approved by Philadelphia County Common Pleas Judge Honorable Anne Marie Coyle on June 15, 2021

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Upper Darby Township, Delaware County, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 87 South Keystone Road, Upper Darby Township, Delaware County, PA
2. 2003 Maroon Ford F-150 PA registration ZMK-4067 VIN(1FTRX18W33NA09123)

The search warrants were presented to and approved by the Honorable Kevin F. Kelly, President Judge of the Common Pleas Court of Delaware County.

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Pottstown Borough and Cheltenham Township, Montgomery, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL

1. 163 Grant Street, Pottstown, Montgomery County Pennsylvania
2. 2138 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania

The search warrants were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Demchick-Alloy on June 15, 2021

On June 16, 2021 shortly after 6:00 A.M., members of the Pennsylvania State Police, Delaware County Drug Task Force, Montgomery County Detectives, and Drug Enforcement Administration executed the aforementioned search warrants. During the search warrant executions in the City & County of Philadelphia, Montgomery County and Delaware County, Pennsylvania, Luis LLAMAS, Juwan WOODS, Zahid IGBAL, and Tiffany SIMON, were located and detained. Officers/Troopers also arrested Michael ARRINGTON and Andre GRANT on separate gun/drug charges.

During the searches of Montgomery County locations, defendants Lolyta LEE and Kenneth SIMON were located.

During the course of searching the aforementioned locations and vehicles the following was seized:

1. 3336 North Hope Street - Philadelphia, PA
 1. approximately 5 pounds of Marijuana (field test positive)
 2. approximately 470 grams of Methamphetamine (field test positive)
 3. approximately 12 grams of Cocaine (field test positive)
 4. approximately 145 grams of Fentanyl (field test positive)
 5. 190 Packets of THC Edibles
 6. 334 individual dosages of Heroin stamped "Venom" (field test positive)
 7. 68 individual dosages of Heroin stamped "Apple Jacks" (field test positive)
 8. 120 individual dosages of Heroin stamped "Buffalo" (field test positive)
 9. 68 individual dosages of Heroin stamped "Skechers" (field test positive)
 10. 92 individual dosages of Heroin stamped "PS5" (field test positive)
 11. Approximately \$45,000 of US Currency
 12. Glock 19 .9MM bearing Serial Number: MUN578
 13. Five 5-cellular telephones
2. 2948 Kip Street - Philadelphia, PA.
 1. Indicia of ownership - LLAMAS
3. 3218 Tyson Avenue, Philadelphia PA 19149
 1. 29 packages of THC infused edible products



[Handwritten Signature]

(Signature of Affiant)

[Handwritten notes: 06/16/21]



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P714D/PA 2021-823680
Defendant Name	First LOLYTA	Middle R	Last LEE

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

4. 1422 North 52nd Street., Philadelphia PA 19131

1. Four (4) pounds of Marijuana
2. 15 Packets of THC Edibles
3. 1,638 New / Unused THC Edibles Bags
4. Glock 22 40 Callber bearing Serial Number: BPAE148
5. Silver/Black Taurus G2C 9MM Serial Number: TMU87326
6. Black Taurus PT809 9MM Serial Number: TGR69871

5. 1721 Conlyn Street, Philadelphia PA 19141

1. A large amount of US currency was found in different locations within the house totaling \$24,260.00.
2. A digital scale with used vials were found in a purse hanging on a closet door.
3. In an additional purse hanging on the closet door a Black Smith & Wesson handgun was recovered with serial number CTM7753.
4. A money counter
5. Assorted drug packaging and trafficking equipment to include but not limited to: rubber bands, unused sandwich bags, green shrink wrap, 2 clear measuring cups with residue, electronic scale, coffee grinder, metal mesh strainer, and a stamp kit labeled 1(heart).

6. 3632 North 3rd Street, Philadelphia PA 19140

1. One Ruger .22 Callber pistol and loaded magazine (Serial Number: 380746594)
2. One stolen Glock 19 9mm pistol and loaded magazine (Serial Number: ACDE324/NCI G244911125)
3. 44 (approximately 44 grams) bundles of plastic bags containing a powder substance. (field tested positive for fentanyl)
4. Approximately 27.8 grams of suspected crystal methamphetamine contained in a plastic bag. (field tested positive for methamphetamine)
5. \$1,175.00 In United States Currency
6. One small clear plastic bag containing suspected cocaine (approximately 0.5 grams) (field test positive)

(IGBAL is person not to possess having a prior felony drug trafficking conviction)

7. 101 West Sharpnack Street, Philadelphia PA 19118.

1. Pistol Sig P250- loaded with 1 chambered
2. Pistol Glock 17 - stolen
3. Romarm Cugir Rifle (AK style)
4. Various packaging to include cocaine and cut
5. In excess of 500 grams of cocaine (field test positive)
6. Six (6) ounces of suspect crack cocaine (field test positive)
7. Two (2) ounces suspect heroin
8. Approximately 300-400 grams of cutting agents
9. Approximately 30 pounds of marijuana and marijuana derivatives
10. Various packaging and drug paraphernalia

8. 163 Grant Street, Pottstown, Montgomery County Pennsylvania

1. 188 Packets of THC Edibles
2. 13 THC Infused soda bottles
3. Numerous THC vape cartridges
4. 20 grams of marijuana
5. Numerous new/unused Ziploc and vacuum sealed bags
6. \$37,290 of US Currency
7. Four (4) cellular telephones
8. Four (4) vehicles

9. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania.

1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweatpants belonging to Kenneth Simon.



(Handwritten signature)
[*]
(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 01018P714D/PA 2021-823660
Defendant Name	First LOLYTA	Middle R	Last LEE

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

10. 97 South Keystone Road, Upper Darby Township, Delaware County

1. One (1) clear knotted bag containing a white powdery substance of suspected cocaine (field test positive).

2. One (1) clear Ziploc bag containing suspected ecstasy.

Orange iron man stamped pill (19)

Red iron man stamped pill (4)

Blue iron man stamped pill (3)

The suspected pills were field tested via trunarc at PSP Philadelphia and found to be Diphenidine.

3. A silver/black Smith & Wesson SD40 VE Serial # FYB6792 containing 13 rounds of .40 caliber Blazer FMJ ammunition was located on top of the hutch.

4. Indicia of ownership/occupancy in name of Hugo HYLAND.

5. One (1) Black vacuum sealed bag containing approximately 1lb of suspected marijuana

6. Blazer .40 caliber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All seized items were seized and entered into evidence at the Pennsylvania State Police barracks - Troop K, Philadelphia. We certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.



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[Handwritten initials]
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(Signature of Affiant)

[*]

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: PHILADELPHIA



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 32-2-48
MDJ Mon. STROHL, WALTER A
Address: 27 S PENNELL RD
LIMA, PA 18037
Telephone: (610) 565-4110

DEFENDANT: (NAME and ADDRESS)
LUIS P LLAMAS
First Name Middle Name Last Name Gen
3336 N HOPE ST,
PHILADELPHIA, PA 19140

NCIC Extradition Code Type
NCIC Extradition Code Type 1 - FELONY FULL

DEFENDANT IDENTIFICATION INFORMATION							
Booklet Number <i>01-15821</i>	Date Filed <i>06/16/21</i>	OTN/Live Scan Number X400512-0	Complaint/Incident Number 01018P713D/PA 2021-823516	Request Lab Services? YES			
Gender M	Date of Birth 04/01/1985	POB PA - USA	Add'l DOB	Co-Defendant? YES			
Defendant Also Known As	Defendant's First Name	Middle Name	Last Name	Suffix			
Race WHITE - W	Ethnicity HISPANIC ORIGIN - H						
Hair Color BLACK - BLK	Eye Color BROWN - BRO						
DNA NO	DNA Location			Weight 250 LBS			
FBI Number	MNU Number			Height 5' 08"			
Defendant Fingerprinted YES	Fingerprint Classification						

DEFENDANT VEHICLE INFORMATION							
Plate #	State	HazMat	Registration Sticker (MM/YY)	Commercial Vehicle?	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
VIN	Year	Make	Model	Style	Color		NO

Office of the Attorney of 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. Pa.R.Crim.P.507.)

Name of Attorney for Commonwealth - Please Print or Type (Signature of Attorney for Commonwealth) (Date)
I, TPR LUKE MCILVAINE / *John Thomas Kessler* 729266/13164 / *#87*
(Name of Affiant - Please Print or Type) (PSP/MP/OTC - Assigned Affiant ID Number & Badge #)
of PENNSYLVANIA STATE POLICE, TROOP G, EASTERN INT UNIT / *Tolson PD* PAPSP1A00 / PA0231200
(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 is 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
(Subdivision Code) 3336 N HOPE ST, PHILADELPHIA CITY
(Place-Political Subdivision)
In PHILADELPHIA County 51 on or about 6/16/2021 AT APPROX. 06:00 HRS
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number 01016F713D/PA 2021-823818
Defendant Name	First LUIS	Middle P	Last LLAMAS

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.

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 0				
Lead? YES	Offense # 1	Section 7512	Subsection A	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code	UCR/NIBRS CC75
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO		Safety Zone NO	Work Zone NO			

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

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted thereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every instance where the communication facility is utilized constitutes a separate offense under this section.

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 0				
Lead? NO	Offense # 2	Section 780-113	Subsection A30	PA Statute (Title) 35	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO		Safety Zone NO	Work Zone NO			

Statute Description (include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1018P713D/PA 2021-823518
Defendant Name	First LUIS	Middle P.	Last LLAMAS

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.

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 0				
Lead? NO	Offense # 3	Section 780-113	Subsection A16	PA Statute (Title) 36	Count 1	Grade M	NCIC Offense Code CS13	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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 0				
Lead? NO	Offense # 4	Section 911	Subsection B2	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code CC91	UCR/NIBRS CC91
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
CORRUPT ORG-INT/CONTROL IN ENTERP

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did, through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1018P713D/PA 2021-823516
Defendant Name	First LUIS	Middle P	Last LLAMAS

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.

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 0				
Lead? NO	Offense # 6	Section 6111	Subsection A1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC51
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

Statute Description (include the name of statute or ordinance):
DEAL IN PROC UNL ACT/INTENT TO PROMOTE

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did conduct a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represented the proceeds of unlawful activity, THE DEFENDANT acted with the intent to promote the carrying on of the unlawful activity.

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				
Lead? NO	Offense # 6	Section 780-113	Subsection A30	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

Statute Description (include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A30 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1018P713D/PA 2021-823616
Defendant Name	First LUIS	Middle P	Last LLAMAS

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.

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				
Lead? NO	Offense # 7	Section 780-113	Subsection A16	PA Statute (Title) 18	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:

The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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				
Lead? NO	Offense # 8	Section 911	Subsection B4	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
CONSP TO VIO 911B1, 911B2, 911B3

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, did conspire to violate the provisions of paragraphs (1), (2) or (3) of this subsection.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1018P713D/PA 2021-823516
Defendant Name	Defendant's First Name LUIS	Middle Name P	Last Name LLAMAS

- 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 6.
- 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 statute 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.)

6-16-2021
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date, 06/16/21 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.

32-4-71
(Magisterial District Court Number)

[Signature]
(Issuing Authority)

Philip S. Turner, Jr.





POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complain/Incident Number O1018P713D/PA 2021-823516
Defendant Name	First LUIS	Middle P	Last LLAMAS

AFFIDAVIT of PROBABLE CAUSE

THIS IS AN OFFICE OF ATTORNEY GENERAL PROSECUTION AND THE FOLLOWING CHARGES HAVE BEEN APPROVED BY DEPUTY ATTORNEY GENERAL KARIN JUDGE.

During the month of October 2020, your affiants, members of the Pennsylvania State Police, and the Delaware County Drug Task Force initiated a narcotics investigation into the Drug Trafficking Organization of Luis LLAMAS.

At the direction of investigators and members of law enforcement confidential informants were utilized to complete five (5) controlled purchases of methamphetamine from October 2020 through March 2021, including one controlled purchase for approximately eight ounces of methamphetamine that was made in Upper Darby Township, Delaware County in December of 2020. Throughout the course of our investigation, your affiants and other members of law enforcement have confirmed that Luis LLAMAS is distributing methamphetamine, cocaine, fentanyl/heroin, marijuana and other narcotics in the City & County of Philadelphia, as well as Delaware County and Montgomery County, Pennsylvania and have identified associates within his Drug Trafficking Organization to be distributing narcotics in the City & County of Philadelphia, Delaware County and Montgomery County, Pennsylvania.

In May 2021 investigators engaged in a proactive investigation involving Non-Consensual intercepts of the Drug Trafficking Organization. During the course of the investigation Luis LLAMAS, utilizing cellular telephone numbers 215-341-4072 and 267-344-7027, was found to be distributing methamphetamine, cocaine, fentanyl/heroin, marijuana (including THC infused "edible" products) and ecstasy pills.

Over the course of our investigation your affiants identified several persons within LLAMAS' drug trafficking organization. As a result of intercepted cellular telephone communications and surveillance, your affiants identified Loyla LEE as LLAMAS' primary source of supply for marijuana and THC infused edible products. LEE, using cellular telephone 484-547

I, TPR. LUKE MCILVAINE / OE Kasser 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.

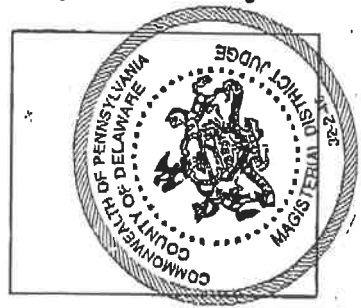
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Signature]
(Signature of Affiant)

Sworn to me and subscribed before me this 16th day of JUNE 2021

Date _____, Magisterial District Judge

My commission expires first Monday of January, 2022





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1018P713D/PA 2021-823616
Defendant Name	First LUIS	Middle P	Last LLAMAS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

-1550, was intercepted on both LLAMAS' telephones. LEE made multiple deliveries of marijuana and THC infused product to LLAMAS at his Hope Street address and he met with LEE in Lower Merion Township, Montgomery County on May 15, 2021 to pay her \$10,000 for prior marijuana deliveries.

Hugo HYLAND, using cellular telephone (216) 469-0974, was identified as a person who LLAMAS' trusted to store quantities of controlled substances at his residence located at 87 South Keystone Road, Upper Darby Township, Delaware County.

LLAMAS also relied on HYLAND to meet with source(s) of supply to pick up multi-pound quantities of methamphetamine and other drugs.

Juwan WOODS was identified as one of LLAMAS' trusted confederates. WOODS, using cellular telephone (215) 594-0974, was supplied controlled substances by LLAMAS, including cocaine. WOODS would also cook cocaine powder into cocaine base ("crack" or "hard") for LLAMAS. Your affiants ultimately conducted a Court authorized intercept of WOODS' 215-594-0974 telephone facility. Interception began early June 2021. During the intercept of WOODS' phone, your affiants captured several conversations wherein WOODS made arrangements to sell both powder and cocaine base (crack or hard) to other persons as well as other controlled substances.

On June 2, 2021, a uniformed Pennsylvania State Trooper stopped a vehicle that contained a parcel. Your affiants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your affiants learned through LLAMAS' communications with others, including Kenneth SIMON, that at least part if not all of those 30 pounds were destined for LLAMAS and the members of his organization.

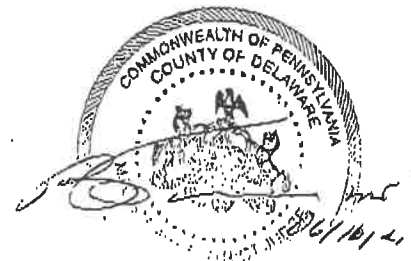
Kenneth SIMON and his wife Tiffany SIMON were integral parts of the LLAMAS drug trafficking organization. Kenneth and Tiffany SIMON together, and independently, came to LLAMAS' residence on North Hope Street to

conduct drug related transactions. LLAMAS would also go to the SIMONS' Conlyn Street address to engage in drug related transactions.

After June 2, 2021, LLAMAS was forced to find other sources of methamphetamine and WOODS stepped in to fill that void as WOODS had an alternate source for methamphetamine. WOODS would contact his source on LLAMAS' behalf and WOODS would coordinate multi-pound methamphetamine sales to LLAMAS. LLAMAS would often send or meet HYLAND with WOODS to pick up the methamphetamine. LLAMAS also relied upon HYLAND to deliver multi-pound quantities to distributors within the LLAMAS drug trafficking organization.

Zahid IGBAL, using cellular telephone facility 267-319-2908, was identified as one of LLAMAS' distributors for heroin/fentanyl and methamphetamine. IGBAL would come to LLAMAS' Hope Street address and other locations, to meet LLAMAS to pick up supplies of fentanyl/heroin and other controlled substances for distribution to other persons.

On June 15, 2021 your affiants prepared search warrants for the following locations and vehicles within the City & County of Philadelphia, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:



[Handwritten Signature]
[s]



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1018P713D/PA 2021-823516
Defendant Name	First LUIS	Middle P	Last LLAMAS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

1. 3336 North Hope Street - Philadelphia, PA
2. 2948 Kip Street - Philadelphia, PA.
3. 3218 Tyson Avenue, Philadelphia PA 19149
4. 1422 North 52nd Street., Philadelphia PA 19131.
5. 1721 Conlyn Street, Philadelphia PA 19141
6. 3632 North 3rd Street, Philadelphia PA 19140
7. 101 West Sharpnack Street, Philadelphia PA 19119.
8. 2016 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1FD006533)
9. 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1260 VIN (1HGCV3F94LA004256)
10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900)
11. 2017 Black Nissan Maxima PA reg KXG-4899 VIN (1N4AA6AP5HC445219)
12. 2021 Gray Toyota Tundra ZPY6195 VIN (5TFAY5F10MX007232)
13. 2017 Silver Ford Taurus PA registration LGP8637 VIN (WA1LGAFE1FD006533)

The search warrants were presented to and approved by Philadelphia County Common Pleas Judge Honorable Anne Marie Coyle on June 15, 2021

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Upper Darby Township, Delaware County, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 97 South Keystone Road, Upper Darby Township, Delaware County, PA
2. 2003 Maroon Ford F-150 PA registration ZMK-4087 VIN(1FTRX18W33NA09123)

The search warrants were presented to and approved by the Honorable Kevin F. Kelly, President Judge of the Common Pleas Court of Delaware County.

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Pottstown Borough and Cheltenham Township, Montgomery, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL

1. 163 Grant Street, Pottstown, Montgomery County Pennsylvania
2. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania

The search warrants were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Demchick-Alloy on June 15, 2021

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**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1010P713D/PA 2021-823516	
Defendant Name	First LUIS	Middle P	Last LLAMAS	

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On June 16, 2021 shortly after 6:00 A.M., members of the Pennsylvania State Police, Delaware County Drug Task Force, Montgomery County Detectives, and Drug Enforcement Administration executed the aforementioned search warrants. During the search warrant executions in the City & County of Philadelphia, Montgomery County and Delaware County, Pennsylvania, Luis LLAMAS, Juwan WOODS, Zahid IGBAL, and Tiffany SIMON, were located and detained. Officers/Troopers also arrested Michael ARRINGTON and Andre GRANT on separate gun/drug charges.

During the searches of Montgomery County locations, defendants Lolyta LEE and Kenneth SIMON were located.

During the course of searching the aforementioned locations and vehicles the following was seized:

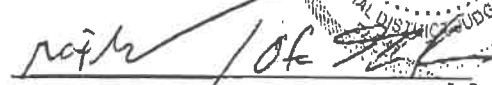
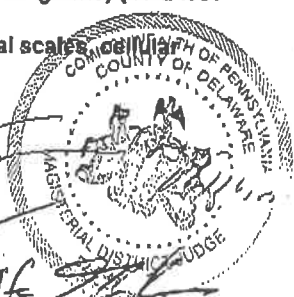
1. 3338 North Hope Street - Philadelphia, PA
 1. approximately 5 pounds of Marijuana (field test positive)
 2. approximately 470 grams of Methamphetamine (field test positive)
 3. approximately 12 grams of Cocaine (field test positive)
 4. approximately 145 grams of Fentanyl (field test positive)
 5. 190 Packets of THC Edibles
 6. 334 Individual dosages of Heroin stamped "Venom" (field test positive)
 7. 68 individual dosages of Heroin stamped "Apple Jacks" (field test positive)
 8. 120 individual dosages of Heroin stamped "Buffalo" (field test positive)
 9. 68 individual dosages of Heroin stamped "Skechers" (field test positive)
 10. 92 individual dosages of Heroin stamped "PS5" (field test positive)
 11. Approximately \$45,000 of US Currency
 12. Glock 19 .9MM bearing Serial Number: MUN57B
 13. Five 5 cellular phones

2. 2948 Kip Street - Philadelphia, PA.
 1. Indicia of ownership - LLAMAS
3. 3218 Tyson Avenue, Philadelphia PA 19149
 1. 29 packages of THC infused edible products

5. 1721 Conlyn Street, Philadelphia PA 19141
 1. A large amount of US currency was found in different locations within the house totaling \$24,260.00.
 2. A digital scale with used vials were found in a purse hanging on a closet door.
 3. In an additional purse hanging on the closet door a Black Smith & Wesson handgun was recovered with serial number CTM7753.
 4. A money counter
 5. Assorted drug packaging and trafficking equipment to include but not limited to: rubber bands, unused sandwich bags, green shrink wrap, 2 clear measuring cups with residue, electronic scale, coffee grinder, metal mesh strainer, and a stamp kit labeled 1(heart).

6. 3632 North 3rd Street, Philadelphia PA 19140
 1. One Ruger .22 Caliber pistol and loaded magazine (Serial Number: 380746594)
 2. One stolen Glock 19 9mm pistol and loaded magazine (Serial Number: ACDE324/NCI G244911125)
 3. 44 (approximately 44 grams) bundles of plastic bags containing a powder substance. (field tested positive for fentanyl)
 4. Approximately 27.8 grams of suspected crystal methamphetamine contained in a plastic bag. (field tested positive for methamphetamine)
 5. \$1,175.00 in United States Currency
 6. One small clear plastic bag containing suspected cocaine (approximately 0.5 grams) (field test positive)
 7. One plastic bag containing several small plastic bags containing suspected cocaine (approximately 1.57 grams) (field test positive)
 8. In addition to the above items, investigators seized several items to include various packaging, digital scales, cellular phones, and IGBAL's Honda bearing Pennsylvania license plate LRL7212.

(IGBAL is person not to possess having a prior felony drug trafficking conviction)



 MAGISTERIAL DISTRICT JUDGE

From:



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1018P713D/PA 2021-923516
Defendant Name	First LUIS	Middle P	Last LLAMAS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

7. 101 West Sharpnack Street, Philadelphia PA 19119.

- 1. Pistol Sig P250- loaded with 1 chambered
- 2. Pistol Glock 17 - stolen
- 3. Romarm Cuglr Rifle (AK style)
- 4. Various packaging to include cocaine and cut
- 5. In excess of 500 grams of cocaine (field test positive)
- 6. Six (6) ounces of suspect crack cocaine (field test positive)
- 7. Two (2) ounces suspect heroin
- 8. Approximately 300-400 grams of cutting agents
- 9. Approximately 30 pounds of marijuana and marijuana derivatives
- 10. Various packaging and drug paraphernalia

8. 163 Grant Street, Pottstown, Montgomery County Pennsylvania

- 1. 188 Packets of THC Edibles
- 2. 13 THC Infused soda bottles
- 3. Numerous THC vape cartridges
- 4. 20 grams of marijuana
- 5. Numerous new/unused Ziploc and vacuum sealed bags
- 6. \$37,290 of US Currency
- 7. Four (4) cellular telephones
- 8. Four (4) vehicles

9. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania.

- 1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweatpants belonging to Kenneth Simon.
- 2. Black iPhone with black case located in master bedroom.
- 3. Black digital scale and small bag of marijuana located in black bookbag in master bedroom.

10. 97 South Keystone Road, Upper Darby Township, Delaware County

- 1. One (1) clear knotted bag containing a white powdery substance of suspected cocaine (field test positive).
- 2. One (1) clear Ziploc bag containing suspected ecstasy.

Orange iron man stamped pill (19)

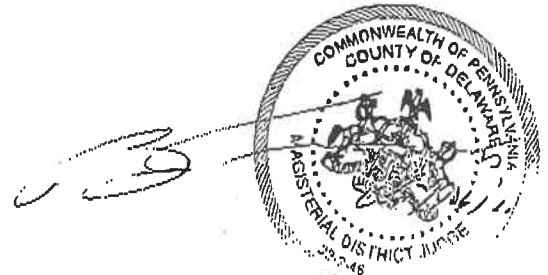
Red iron man stamped pill (4)

Blue iron man stamped pill (3)

The suspected pills were field tested via trunarc at PSP Philadelphia and found to be Diphenidine.

- 3. A silver/black Smith & Wesson SD40 VE Serial # FYB6792 containing 13 rounds of .40 caliber Blazer FMJ ammunition was located on top of the hutch.
- 4. Indicia of ownership/occupancy in name of Hugo HYLAND.
- 5. One (1) Black vacuum sealed bag containing approximately 1lb of suspected marijuana
- 6. Blazer .40 caliber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All seized items were seized and entered into evidence at the Pennsylvania State Police barracks - Troop K, Philadelphia. We certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.



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COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: PHILADELPHIA



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: **32-2-48**
 MDJ Hon. **STROHL, WALTER A**
 Address: **27 S PENNELL RD**
LIMA, PA 19037
 Telephone: **(610) 585-4110**

DEFENDANT: (NAME and ADDRESS)
RICHARD JAVIER VEGA
First Name Middle Name Last Name
2868 FRANKFORD AVE,
PHILADELPHIA, PA 19134

NCIC Extradition Code Type 1 - FELONY FULL

DEFENDANT IDENTIFICATION INFORMATION

Docket Number 2020	Date Filed 01/16/21	STN/Live Scan Number 12147492-2	Complaint/Incident Number 01018P722F/PA 2021-750688	Request Lab Services? YES
Gender M	Date of Birth 08/23/1983	POB GA - USA	Add'l DOB	Co-Defendant? YES
Defendant Also Known As	Defendant's First Name	Middle Name	Last Name	Suffix
Race WHITE - W	Ethnicity HISPANIC ORIGIN - H			
Hair Color BLACK - BLK	Eye Color BROWN - BRO			
DNA NO	DNA Location			Weight 300 LBS
FBI Number	MNU Number			Height 5' 08"
Defendant Fingerprinted NO	Fingerprint Classification			

DEFENDANT VEHICLE INFORMATION

Plate #	State	HazMat	Registration Sticker (MM/YY)	Commercial Vehicle?	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def. NO
VIN	Year	Make	Model	Style	Color		

Office of the Attorney of 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. Pa.R.Crim.P.507.)

Name of Attorney for Commonwealth - Please Print or Type: _____ (Signature of Attorney for Commonwealth) _____ (Date)
 I, **TPR. LUKE MCILVAINE / Joe Thomas Kesser** **729268/13184** **#87**
 (Name of Affiant - Please Print or Type) (PSP/MPOETC - Assigned Affiant ID Number & Badge #)
 of **PENNSYLVANIA STATE POLICE, TROOP O. EASTERN INT UNIT / Folsom PD** **PAPSP1A00 / PA0231200**
 (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 is 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 ON DIAMOND ST AT ITS INTERSECTION WITH N 10TH ST,**
 (Subdivision Code) **PHILADELPHIA CITY**
 (Place-Political Subdivision)
 in **PHILADELPHIA** County **51** on or about **8/18/2021 AT APPROX. 16:15 HRS**
 (County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P722F/PA 2021-758688
Defendant Name	First RICHARD	Middle JAVIER	Last VEGA

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.

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 0				
Lead? NO	Offense # 1	Section 911	Subsection B3	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CCB1
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO		Safety Zone NO	Work Zone NO			

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

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, who was employed or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity.

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 0				
Lead? NO	Offense # 2	Section 911	Subsection B4	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO		Safety Zone NO	Work Zone NO			

Statute Description (include the name of statute or ordinance):
CONSP TO VIOL 911B1, 911B2, 911B3

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, did conspire to violate the provisions of paragraphs (1), (2) or (3) of this subsection.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complain/Incident Number 01018P722F/PA 2021-768688
Defendant Name	First RICHARD	Middle JAVIER	Last VEGA

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.

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 0				
Lead? NO	Offense # 3	Section 5111	Subsection A1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC51
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

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

DEAL IN PROC UNL ACT/INTENT TO PROMOTE

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did conduct a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represented the proceeds of unlawful activity, THE DEFENDANT acted with the intent to promote the carrying on of the unlawful activity.

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 0				
Lead? NO	Offense # 4	Section 780-113	Subsection A30	PA Statute (Title) 36	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

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

MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number 01018P722F/PA 2021-768688
Defendant Name	First RICHARD	Middle JAVIER	Last VEGA

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.

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 0				
Lead? NO	Offense # 6	Section 780-113	Subsection A16	PA Statute (Title) 35	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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 0				
Lead? YES	Offense # 6	Section 780-113	Subsection A16	PA Statute (Title) 18	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:
The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P722F/PA 2021-788688	
Defendant Name	First RICHARD	Middle JAVIER	Last VEGA	

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.

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 0			
Lead? NO	Offense # 7	Section 780-113	Subsection A30	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code UCR/NIBRS CS13
PennDOT DATA (if applicable)	Accident Number		Interstate Indicator NO	Safety Zone NO	Work Zone NO		

Statute Description (Include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:
The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A30 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with Intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P722F/PA 2021-758588
Defendant Name	Defendant's First Name RICHARD	Middle Name JAVIER	Last Name VEGA

- 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 6
- 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 statute 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.)

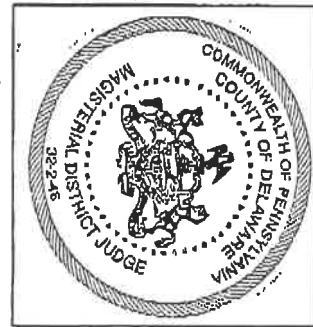
6-16-2021
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date, 06/16/21 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.

321-31
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P722F/PA 2021-758588
Defendant Name	First RICHARD	Middle JAVIER	Last VEGA

AFFIDAVIT of PROBABLE CAUSE

THIS IS AN OFFICE OF ATTORNEY GENERAL PROSECUTION AND THE FOLLOWING CHARGES HAVE BEEN APPROVED BY DEPUTY ATTORNEY GENERAL KARIN JUDGE.

During the month of October 2020, your affiants, members of the Pennsylvania State Police, and the Delaware County Drug Task Force initiated a narcotics investigation into the Drug Trafficking Organization of Luis LLAMAS. At the direction of investigators and members of law enforcement confidential informants were utilized to complete five (5) controlled purchases of methamphetamine from October 2020 through March 2021, including one controlled purchase for approximately eight ounces of methamphetamine that was made in Upper Darby Township, Delaware County in December of 2020. Throughout the course of our investigation, your affiants and other members of law enforcement have confirmed that Luis LLAMAS is distributing methamphetamine, cocaine, fentanyl/heroin, marijuana and other narcotics in the City & County of Philadelphia, as well as Delaware County and Montgomery County, Pennsylvania and have identified associates within his Drug Trafficking Organization to be distributing narcotics in the City & County of Philadelphia, Delaware County and Montgomery County, Pennsylvania.

In May 2021 investigators engaged in a proactive investigation involving Non-Consensual Intercepts of the Drug Trafficking Organization. During the course of the investigation Luis LLAMAS, utilizing cellular telephone numbers 215-341-4072 and 267-344-7027, was found to be distributing methamphetamine, cocaine, fentanyl/heroin, marijuana (including THC infused "edible" products) and ecstasy pills.

Over the course of our investigation your affiants identified several persons within LLAMAS' drug trafficking organization. As a result of intercepted cellular telephone communications and surveillance, your affiants identified Lolyta LEE as LLAMAS' primary source of supply for marijuana and THC infused edible products. LEE, using cellular telephone 484-547

I, TPR. LUKE MCILVAINE / *of Karin* 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.

McIlvaine
 (Signature of Affiant)

Sworn to me and subscribed before me this 16th day of JUNE 2021

Date _____, Magisterial District Judge

My commission expires first Monday of January, 2022





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P722F/PA 2021-758688
Defendant Name	First RICHARD	Middle JAVIER	Last VEGA

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

-1650, was intercepted on both LLAMAS' telephones. LEE made multiple deliveries of marijuana and THC Infused product to LLAMAS at his Hope Street address and he met with LEE in Lower Merion Township, Montgomery County on May 15, 2021 to pay her \$10,000 for prior marijuana deliveries.

Hugo HYLAND, using cellular telephone (215) 459-0974, was identified as a person who LLAMAS' trusted to store quantities of controlled substances at his residence located at 97 South Keystone Road, Upper Darby Township, Delaware County. LLAMAS also relied on HYLAND to meet with source(s) of supply to pick up multi-pound quantities of methamphetamine and other drugs.

Juwan WOODS was identified as one of LLAMAS' trusted confederates. WOODS, using cellular telephone (215) 594-0974, was supplied controlled substances by LLAMAS, including cocaine. WOODS would also cook cocaine powder into cocaine base ("crack" or "hard") for LLAMAS. Your affiants ultimately conducted a Court authorized intercept of WOODS 215-594-0974 telephone facility. Interception began early June 2021. During the intercept of WOODS' phone, your affiants captured several conversations wherein WOODS made arrangements to sell both powder and cocaine base (crack or hard) to other persons as well as other controlled substances.

On June 2, 2021, a uniformed Pennsylvania State Trooper stopped a vehicle that contained a parcel. Your affiants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your affiants learned through LLAMAS' communications with others, including Kenneth SIMON, that at least part if not all of those 30 pounds were destined for LLAMAS and the members of his organization.

Kenneth SIMON and his wife Tiffany SIMON were integral parts of the LLAMAS drug trafficking organization. Kenneth and Tiffany SIMON together, and independently, came to LLAMAS' residence on North Hope Street to

conduct drug related transactions. LLAMAS would also go to the SIMONS' Conlyn Street address to engage in drug related transactions.

After June 2, 2021, LLAMAS was forced to find other sources of methamphetamine and WOODS stepped in to fill that void as WOODS had an alternate source for methamphetamine. WOODS would contact his source on LLAMAS' behalf and WOODS would coordinate multi-pound methamphetamine sales to LLAMAS. LLAMAS would often send or meet HYLAND with WOODS to pick up the methamphetamine. LLAMAS also relied upon HYLAND to deliver multi-pound quantities to distributors within the LLAMAS drug trafficking organization.

Zahid IGBAL, using cellular telephone facility 267-319-2908, was identified as one of LLAMAS' distributors for heroin/fentanyl and methamphetamine. IGBAL would come to LLAMAS' Hope Street address and other locations, to meet LLAMAS to pick up supplies of fentanyl/heroin and other controlled substances for distribution to other persons.

On June 15, 2021 your affiants prepared search warrants for the following locations and vehicles within the City & County of Philadelphia, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 3336 North Hope Street - Philadelphia, PA
2. 2948 Kip Street - Philadelphia, PA.
3. 3218 Tyson Avenue, Philadelphia PA 19149
4. 1422 North 52nd Street., Philadelphia PA 19131.
5. 1721 Conlyn Street, Philadelphia PA 19141
6. 3632 North 3rd Street, Philadelphia PA 19140
7. 101 West Sharpnack Street, Philadelphia PA 19119.
8. 2015 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1FD006503)



[Signature]
06/11/21



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P722FIPA 2021-758588
Defendant Name	First RICHARD	Middle JAVIER	Last VEGA

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

9. 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1250 VIN (1HGCV3F94LA004268)
10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900)
11. 2017 Black Nissan Maxima PA reg KXG-4899 VIN (1N4AA6AP6HC445219)
12. 2021 Grey Toyota Tundra ZPY6195 VIN (5TFAY5F10MX007232)
13. 2017 Silver Ford Taurus PA registration LGP8637 VIN (WA1LGAFE1FD006533)

The search warrants were presented to and approved by Philadelphia County Common Pleas Judge Honorable Anna Marie Coyle on June 15, 2021

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Upper Darby Township, Delaware County, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 97 South Keystone Road, Upper Darby Township, Delaware County, PA
2. 2003 Maroon Ford F-150 PA registration ZMK-4067 VIN(1FTRX18W33NA09123)

The search warrants were presented to and approved by the Honorable Kevin F. Kelly, President Judge of the Common Pleas Court of Delaware County.

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Pottstown Borough and Cheltenham Township, Montgomery, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL

1. 163 Grant Street, Pottstown, Montgomery County Pennsylvania
2. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania

The search warrants were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Demchick-Alloy on June 15, 2021

On June 16, 2021 shortly after 8:00 A.M., members of the Pennsylvania State Police, Delaware County Drug Task Force, Montgomery County Detectives, and Drug Enforcement Administration executed the aforementioned search warrants. During the search warrant executions in the City & County of Philadelphia, Montgomery County and Delaware County, Pennsylvania, Luis LLAMAS, Juwan WOODS, Zahid IGBAL, and Tiffany SIMON, were located and detained. Officers/Troopers also arrested Michael ARRINGTON and Andre GRANT on separate gun/drug charges.

During the searches of Montgomery County locations, defendants Lolyta LEE and Kenneth SIMON were located.

During the course of searching the aforementioned locations and vehicles the following was seized:

1. 3336 North Hope Street - Philadelphia, PA
 1. approximately 5 pounds of Marijuana (field test positive)
 2. approximately 470 grams of Methamphetamine (field test positive)
 3. approximately 12 grams of Cocaine (field test positive)
 4. approximately 145 grams of Fentanyl (field test positive)
 5. 190 Packets of THC Edibles
 6. 334 Individual dosages of Heroin stamped "Venom" (field test positive)
 7. 68 individual dosages of Heroin stamped "Apple Jacks" (field test positive)
 8. 120 individual dosages of Heroin stamped "Buffalo" (field test positive)
 9. 68 individual dosages of Heroin stamped "Skechers" (field test positive)
 10. 92 Individual dosages of Heroin stamped "PSB" (field test positive)
 11. Approximately \$45,000 of US Currency
 12. Glock 19 .9MM bearing Serial Number: MUN578
 13. Five 5 cellular telephones
2. 2948 Kip Street - Philadelphia, PA.
 1. Indicia of ownership - LLAMAS
3. 3218 Tyson Avenue, Philadelphia PA 19149
 1. 29 packages of THC infused edible products



Richard J. Vega

04/16
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**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P722F/PA 2021-758588
Defendant Name	First RICHARD	Middle JAVIER	Last VEGA

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

4. 1422 North 52nd Street., Philadelphia PA 19131

1. Four (4) pounds of Marijuana
2. 15 Packets of THC Edibles
3. 1,638 New / Unused THC Edibles Bags
4. Glock 22 40 Callber bearing Serial Number: 8PAE148
5. Silver/Black Taurus G2C 9MM Serial Number: TMU87326
6. Black Taurus PT809 9MM Serial Number: TGR69871

5. 1721 Conlyn Street, Philadelphia PA 19141

1. A large amount of US currency was found in different locations within the house totaling \$24,260.00.
2. A digital scale with used vials were found in a purse hanging on a closet door.
3. In an additional purse hanging on the closet door a Black Smith & Wesson handgun was recovered with serial number CTM7753.
4. A money counter
5. Assorted drug packaging and trafficking equipment to include but not limited to: rubber bands, unused sandwich bags, green shrink wrap, 2 clear measuring cups with residue, electronic scale, coffee grinder, metal mesh strainer, and a stamp kit labeled 1(heart).

6. 3632 North 3rd Street, Philadelphia PA 19140

1. One Ruger .22 Caliber pistol and loaded magazine (Serial Number: 380748594)
2. One stolen Glock 19 9mm pistol and loaded magazine (Serial Number: ACDE324/NCI G244911125)
3. 44 (approximately 44 grams) bundles of plastic bags containing a powder substance. (field tested positive for fentanyl)
4. Approximately 27.8 grams of suspected crystal methamphetamine contained in a plastic bag. (field tested positive for methamphetamine)
5. \$1,175.00 in United States Currency

(IGBAL is person not to possess having a prior felony drug trafficking conviction)

7. 101 West Sharpnack Street, Philadelphia PA 19119.

1. Pistol Sig P250- loaded with 1 chambered
2. Pistol Glock 17 - stolen
3. Romarm Cuglr Rifle (AK style)
4. Various packaging to include cocaine and cut
5. In excess of 500 grams of cocaine (field test positive)
6. Six (6) ounces of suspect crack cocaine (field test positive)
7. Two (2) ounces suspect heroin
8. Approximately 300-400 grams of cutting agents
9. Approximately 30 pounds of marijuana and marijuana derivatives
10. Various packaging and drug paraphernalia

8. 163 Grant Street, Pottstown, Montgomery County Pennsylvania

1. 188 Packets of THC Edibles
2. 13 THC infused soda bottles
3. Numerous THC vape cartridges
4. 20 grams of marijuana
5. Numerous new/unused Ziploc and vacuum sealed bags
6. \$37,290 of US Currency
7. Four (4) cellular telephones
8. Four (4) vehicles

9. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania.

1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweatpants belonging to Kenneth Simon.



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06/11/21



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P722F/PA 2021-758688
Defendant Name	First RICHARD	Middle JAVIER	Last VEGA

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

10. 97 South Keystone Road, Upper Darby Township, Delaware County

1. One (1) clear knotted bag containing a white powdery substance of suspected cocaine (field test positive).

2. One (1) clear Ziploc bag containing suspected ecstasy.

Orange iron man stamped pill (19)

Red iron man stamped pill (4)

Blue iron man stamped pill (3)

The suspected pills were field tested via trunarc at PSP Philadelphia and found to be Diphenidine.

3. A silver/black Smith & Wesson SD40 VE Serial # FYB6792 containing 13 rounds of .40 caliber Blazer FMJ ammunition was located on top of the hutch.

4. Indicia of ownership/occupancy in name of Hugo HYLAND.

5. One (1) Black vacuum sealed bag containing approximately 1lb of suspected marijuana

6. Blazer .40 caliber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All seized items were seized and entered into evidence at the Pennsylvania State Police barracks – Troop K, Philadelphia. We certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Your affiants respectfully request a warrant be issued.



[Handwritten signature]

06/16
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COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: PHILADELPHIA



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 32-Z-46
MDJ Hon. STROHL, WALTER A
Address: 27 S PENNELL RD
LIMA, PA 19037
Telephone: (610) 688-4110

DEFENDANT: (NAME and ADDRESS)
TIFFANY TENILLE SIMON
First Name Middle Name Last Name
1721 CONLYN ST,
PHILADELPHIA, PA 19141

NCIC Extradition Code Type 1 - FELONY FULL

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: 2021-21 Date Filed: 6/16/21 OTN/Live Scan Number: X400608-1 Complain/Incident Number: 01016P720E/PA 2021-823367 Request Lab Services? YES
Gender: F Date of Birth: 06/18/1981 POB: PA - USA Add'l DOB: Co-Defendant? YES
Defendant Also Known As: Defendant's First Name: Middle Name: Last Name: Suffix:
Race: BLACK - B Ethnicity: NOT OF HISPANIC ORIGIN - N
Hair Color: BLACK - BLK Eye Color: BROWN - BRO
DNA: NO DNA Location: Weight: 150 LBS
FBI Number: MNU Number: Height: 5' 04"
Defendant Fingerprinted: YES Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

Plate #: VIN: State: Year: HazMat: Make: Registration Sticker (MM/YY): Model: Commercial Vehicle?: School Veh.: Style: Oth. NCIC Veh. Code: Color: Reg. same as Def.: NO

Office of the Attorney of 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. Pa.R.Crim.P.607.)

Name of Attorney for Commonwealth - Please Print or Type: (Signature of Attorney for Commonwealth) (Date)

I, TPR. LUKE MCVLAINE / JOR [Signature] Kassar 729288/13184 #87
(Name of Affiant - Please Print or Type) (PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of PENNSYLVANIA STATE POLICE, TROOP O, EASTERN INT UNIT / Federal PD
(Identify Department or Agency Represented and Political Subdivision) PAPSP1A00 / PA 823120
(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 is 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
(Subdivision Code) 1721 CONLYN ST, PHILADELPHIA CITY
(Place-Political Subdivision)
in PHILADELPHIA County 51 on or about 6/16/2021 AT APPROX. 14:46 HRS
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number O1018P720E/PA 2021-823367
Defendant Name	First TIFFANY	Middle TENILLE	Last SIMON

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.

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 0				
Lead? YES	Offense # 1	Section 911	Subsection B3	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (Include the name of statute or ordinance):
CORRUPT ORGANIZATIONS - EMPLOYEE

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, who was employed or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity.

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 0				
Lead? NO	Offense # 2	Section 7512	Subsection A	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code	UCR/NIBRS CC75
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

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

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted thereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every instance where the communication facility is utilized constitutes a separate offense under this section.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number O1018P720E/PA 2021-823367
Defendant Name	First TIFFANY	Middle TENILLE	Last SIMON

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.

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				
Lead? NO	Offense # 3	Section 911	Subsection B4	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC81
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (Include the name of statute or ordinance):
CONSP TO VIC 911B1, 911B2, 911B3

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, did conspire to violate the provisions of paragraphs (1), (2) or (3) of this subsection.

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				
Lead? NO	Offense # 4	Section 6111	Subsection A1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC51
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

Statute Description (Include the name of statute or ordinance):
DEAL IN PROC UNL ACT/INTENT TO PROMOTE

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did conduct a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represented the proceeds of unlawful activity, THE DEFENDANT acted with the intent to promote the carrying on of the unlawful activity.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number 01018P720E/PA 2021-823367
Defendant Name	First TIFFANY	Middle TENILLE	Last SIMON

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.

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				
Lead? NO	Offense # 5	Section 780-113	Subsection A30	PA Statute (Title) 35	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

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

MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act

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				
Lead? NO	Offense # 6	Section 780-113	Subsection A16	PA Statute (Title) 35	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

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

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Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number O1018P720E/PA 2021-823367
Defendant Name	First TIFFANY	Middle TENILLE	Last SIMON

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.

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				
Lead? NO	Offense # 7	Section 780-113	Subsection A30	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

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

MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A30 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act

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				
Lead? NO	Offense # 8	Section 780-113	Subsection A16	PA Statute (Title) 18	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO		Safety Zone NO		Work Zone NO	

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

INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:

The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400508-1	Complaint/Incident Number O1018P720E/PA 2021-823367
Defendant Name	Defendant's First Name TIFFANY	Middle Name TENILLE	Last Name SIMON

- 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 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 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 statute 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.)

6-16-2021
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date, 06/16/21 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.

32-1-31
(Magisterial District Court Number)

[Signature]
(Issuing Authority)

Phillip S. Turner, Jr.





POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number O1018P720E/PA 2021-823367
Defendant Name	First TIFFANY	Middle TENILLE	Last SIMON

AFFIDAVIT of PROBABLE CAUSE

THIS IS AN OFFICE OF ATTORNEY GENERAL PROSECUTION AND THE FOLLOWING CHARGES HAVE BEEN APPROVED BY DEPUTY ATTORNEY GENERAL KARIN JUDGE.

During the month of October 2020, your affiants, members of the Pennsylvania State Police, and the Delaware County Drug Task Force Initiated a narcotics investigation into the Drug Trafficking Organization of Luis LLAMAS. At the direction of Investigators and members of law enforcement confidential Informants were utilized to complete five (5) controlled purchases of methamphetamine from October 2020 through March 2021, including one controlled purchase for approximately eight ounces of methamphetamine that was made in Upper Darby Township, Delaware County in December of 2020. Throughout the course of our investigation, your affiants and other members of law enforcement have confirmed that Luis LLAMAS is distributing methamphetamine, cocaine, fentanyl/heroin, marijuana and other narcotics in the City & County of Philadelphia, as well as Delaware County and Montgomery County, Pennsylvania and have identified associates within his Drug Trafficking Organization to be distributing narcotics in the City & County of Philadelphia, Delaware County and Montgomery County, Pennsylvania.

In May 2021 investigators engaged in a proactive investigation involving Non-Consensual Intercepts of the Drug Trafficking Organization. During the course of the investigation Luis LLAMAS, utilizing cellular telephone numbers 215-341-4072 and 267-344-7027, was found to be distributing methamphetamine, cocaine, fentanyl/heroin, marijuana (including THC infused "edible" products) and ecstasy pills.

Over the course of our investigation your affiants identified several persons within LLAMAS' drug trafficking organization. As a result of intercepted cellular telephone communications and surveillance, your affiants identified Lolyta LEE as LLAMAS' primary source of supply for marijuana and THC infused edible products. LEE, using cellular telephone 484-547

I, TPR. LUKE MCILVAINE / of Kesser 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.


 (Signature of Affiant)

Sworn to me and subscribed before me this 16th day of JUNE 2021

_____ Date _____, Magisterial District Judge

My commission expires first Monday of January, 2022





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number O1018P720E/PA 2021-823387
Defendant Name	First TIFFANY	Middle TENILLE	Last SIMON

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

-1650, was intercepted on both LLAMAS' telephones. LEE made multiple deliveries of marijuana and THC infused product to LLAMAS at his Hope Street address and he met with LEE in Lower Merion Township, Montgomery County on May 15, 2021 to pay her \$10,000 for prior marijuana deliveries.

Hugo HYLAND, using cellular telephone (215) 459-0974, was identified as a person who LLAMAS' trusted to store quantities of controlled substances at his residence located at 97 South Keystone Road, Upper Darby Township, Delaware County.

LLAMAS also relied on HYLAND to meet with source(s) of supply to pick up multi-pound quantities of methamphetamine and other drugs.

Juwan WOODS was identified as one of LLAMAS' trusted confederates. WOODS, using cellular telephone (215) 594-0974, was supplied controlled substances by LLAMAS, including cocaine. WOODS would also cook cocaine powder into cocaine base ("crack" or "hard") for LLAMAS. Your affiants ultimately conducted a Court authorized intercept of WOODS 215-594-0974 telephone facility. Interception began early June 2021. During the intercept of WOODS' phone, your affiants captured several conversations wherein WOODS made arrangements to sell both powder and cocaine base (crack or hard) to other persons as well as other controlled substances.

On June 2, 2021, a uniformed Pennsylvania State Trooper stopped a vehicle that contained a parcel. Your affiants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your affiants learned through LLAMAS' communications with others, including Kenneth SIMON, that at least part if not all of those 30 pounds were destined for LLAMAS and the members of his organization.

Kenneth SIMON and his wife Tiffany SIMON were integral parts of the LLAMAS drug trafficking organization. Kenneth and Tiffany SIMON together, and independently, came to LLAMAS' residence on North Hope Street to

conduct drug related transactions. LLAMAS would also go to the SIMONS' Conlyn Street address to engage in drug related transactions.

After June 2, 2021, LLAMAS was forced to find other sources of methamphetamine and WOODS stepped in to fill that void as WOODS had an alternate source for methamphetamine. WOODS would contact his source on LLAMAS' behalf and WOODS would coordinate multi-pound methamphetamine sales to LLAMAS. LLAMAS would often send or meet HYLAND with WOODS to pick up the methamphetamine. LLAMAS also relied upon HYLAND to deliver multi-pound quantities to distributors within the LLAMAS drug trafficking organization.

Zahid IGBAL, using cellular telephone facility 267-319-2908, was identified as one of LLAMAS' distributors for heroin/fentanyl and methamphetamine. IGBAL would come to LLAMAS' Hope Street address and other locations, to meet LLAMAS to pick up supplies of fentanyl/heroin and other controlled substances for distribution to other persons.

On June 15, 2021 your affiants prepared search warrants for the following locations and vehicles within the City & County of Philadelphia, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 3336 North Hope Street - Philadelphia, PA
2. 2948 Kip Street - Philadelphia, PA.
3. 3218 Tyson Avenue, Philadelphia PA 19149
4. 1422 North 52nd Street., Philadelphia PA 19131.
5. 1721 Conlyn Street, Philadelphia PA 19141
6. 3632 North 3rd Street, Philadelphia PA 19140
7. 101 West Sharpnack Street, Philadelphia PA 19119.
8. 2015 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1PD006532)



[Handwritten signature]
[Handwritten initials]

(Signature of Affiant) [*]



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number O1018P720E/PA 2021-823387
Defendant Name	First TIFFANY	Middle TENILLE	Last SIMON

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

9. 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1250 VIN (1HGCV3F94LA004266)
10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900)
11. 2017 Black Nissan Maxima PA reg KXG-4899 VIN (1N4AA6AP5HC445219)
12. 2021 Grey Toyota Tundra ZPY6195 VIN (5TFAY5F10MX007232)
13. 2017 Silver Ford Taurus PA registration LGP8637 VIN (WA1LGAFE1FD006533)

The search warrants were presented to and approved by Philadelphia County Common Pleas Judge Honorable Anne Marie Coyle on June 15, 2021

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Upper Darby Township, Delaware County, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 97 South Keystone Road, Upper Darby Township, Delaware County, PA
2. 2003 Maroon Ford F-150 PA registration ZMK-4067 VIN(1FTRX18W33NA09123)

The search warrants were presented to and approved by the Honorable Kevin F. Kelly, President Judge of the Common Pleas Court of Delaware County.

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Pottstown Borough and Cheltenham Township, Montgomery, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL

1. 183 Grant Street, Pottstown, Montgomery County Pennsylvania
2. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania

The search warrants were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Demchick-Alloy on June 15, 2021

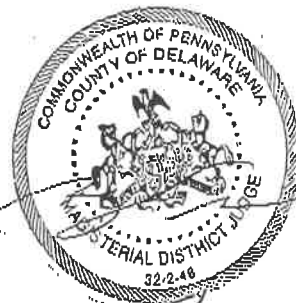
On June 16, 2021 shortly after 6:00 A.M., members of the Pennsylvania State Police, Delaware County Drug Task Force, Montgomery County Detectives, and Drug Enforcement Administration executed the aforementioned search warrants. During the search warrant executions in the City & County of Philadelphia, Montgomery County and Delaware County, Pennsylvania, Luis LLAMAS, Juwan WOODS, Zahid IGBAL, and Tiffany SIMON, were located and detained. Officers/Troopers also arrested Michael ARRINGTON and Andre GRANT on separate gun/drug charges.

During the searches of Montgomery County locations, defendants Lolyta LEE and Kenneth SIMON were located.

During the course of searching the aforementioned locations and vehicles the following was seized:

1. 3336 North Hope Street - Philadelphia, PA
 1. approximately 5 pounds of Marijuana (field test positive)
 2. approximately 470 grams of Methamphetamine (field test positive)
 3. approximately 12 grams of Cocaine (field test positive)
 4. approximately 145 grams of Fentanyl (field test positive)
 5. 190 Packets of THC Edibles
 6. 334 individual dosages of Heroin stamped "Venom" (field test positive)
 7. 68 individual dosages of Heroin stamped "Apple Jacks" (field test positive)
 8. 120 individual dosages of Heroin stamped "Buffalo" (field test positive)
 9. 68 individual dosages of Heroin stamped "Skechers" (field test positive)
 10. 92 individual dosages of Heroin stamped "PS5" (field test positive)
 11. Approximately \$46,000 of US Currency
 12. Glock 19 .9MM bearing Serial Number: MUN578
 13. Five 5 cellular telephones

2. 2948 Kip Street - Philadelphia, PA.
 1. Indicia of ownership - LLAMAS
3. 3218 Tyson Avenue, Philadelphia PA 19149
 1. 29 packages of THC infused edible products



[Signature]
 (Signature of Affiant) [x]

06/16/21



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number O1018P720E/PA 2021-823367
Defendant Name	First TIFFANY	Middle TENILLE	Last SIMON

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

4. 1422 North 62nd Street, Philadelphia PA 19131

1. Four (4) pounds of Marijuana
2. 15 Packets of THC Edibles
3. 1,638 New / Unused THC Edibles Bags
4. Glock 22 40 Caliber bearing Serial Number: BPAE148
5. Silver/Black Taurus G2C 9MM Serial Number: TMU87326
6. Black Taurus PT809 9MM Serial Number: TGR69871

5. 1721 Conlyn Street, Philadelphia PA 19141

1. A large amount of US currency was found in different locations within the house totaling \$24,260.00.
2. A digital scale with used vials were found in a purse hanging on a closet door.
3. In an additional purse hanging on the closet door a Black Smith & Wesson handgun was recovered with serial number CTM7753.
4. A money counter
5. Assorted drug packaging and trafficking equipment to include but not limited to: rubber bands, unused sandwich bags, green shrink wrap, 2 clear measuring cups with residue, electronic scale, coffee grinder, metal mesh strainer, and a stamp ktl labeled 1(heart).

6. 3632 North 3rd Street, Philadelphia PA 19140

1. One Ruger .22 Caliber pistol and loaded magazine (Serial Number: 380746694)
2. One stolen Glock 19 9mm pistol and loaded magazine (Serial Number: ACDE324/NCI G244911125)
3. 44 (approximately 44 grams) bundles of plastic bags containing a powder substance. (field tested positive for fentanyl)
4. Approximately 27.8 grams of suspected crystal methamphetamine contained in a plastic bag. (field tested positive for methamphetamine)
5. \$1,175.00 in United States Currency

(IGBAL is person not to possess having a prior felony drug trafficking conviction)

7. 101 West Sharpnack Street, Philadelphia PA 19119.

1. Pistol Sig P250- loaded with 1 chambered
2. Pistol Glock 17 - stolen
3. Romarm Cugir Rifle (AK style)
4. Various packaging to include cocaine and cut
5. In excess of 500 grams of cocaine (field test positive)
6. Six (6) ounces of suspect crack cocaine (field test positive)
7. Two (2) ounces suspect heroin
8. Approximately 300-400 grams of cutting agents
9. Approximately 30 pounds of marijuana and marijuana derivatives
10. Various packaging and drug paraphernalia

8. 163 Grant Street, Pottstown, Montgomery County Pennsylvania

1. 188 Packets of THC Edibles
2. 13 THC Infused soda bottles
3. Numerous THC vape cartridges
4. 20 grams of marijuana
5. Numerous new/unused Ziploc and vacuum sealed bags
6. \$37,290 of US Currency
7. Four (4) cellular telephones
8. Four (4) vehicles

9. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania.

1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweatpants belonging to Kenneth Simon.



[Handwritten Signature]
(Signature of Affiant) [*]



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number O1018P720E/PA 2021-823367
Defendant Name	First TIFFANY	Middle TENILLE	Last SIMON

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

10. 97 South Keystone Road, Upper Darby Township, Delaware County

- 1. One (1) clear knotted bag containing a white powdery substance of suspected cocaine (field test positive).
- 2. One (1) clear Ziploc bag containing suspected ecstasy.

- Orange iron man stamped pill (18)
- Red iron man stamped pill (4)
- Blue iron man stamped pill (3)

The suspected pills were field tested via trunarc at PSP Philadelphia and found to be Diphenidine.

- 3. A silver/black Smith & Wesson SD40 VE Serial # FYB6792 containing 13 rounds of .40 caliber Blazer FMJ ammunition was located on top of the hutch.
- 4. Indicia of ownership/occupancy in name of Hugo HYLAND.
- 5. One (1) Black vacuum sealed bag containing approximately 1lb of suspected marijuana
- 6. Blazer .40 caliber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All seized items were seized and entered into evidence at the Pennsylvania State Police barracks – Troop K, Philadelphia. We certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.



06/16/21

[Handwritten Signature]
(Signature of Affiant) [x]

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: PHILADELPHIA



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 32-2-48
MDJ Hon. STROHL, WALTER A
Address: 27 8 PENNELL RD
LIMA, PA 19037
Telephone: (610) 585-4110

DEFENDANT: (NAME and ADDRESS)

ZAHID IGBAL
First Name Middle Name Last Name Gen
3632 N 3RD ST,
PHILADELPHIA, PA 19140

NCIC Extradition Code Type

NCIC Extradition Code Type 1 - FELONY FULL

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CE-15921	Date Filed 6/16/21	OTN/Live Scan Number X400524-5	Complaint/Incident Number O1018P716E/PA 2021-823642	Request Lab Services? YES
Gender M	Date of Birth 01/02/1997	POB PA - USA	Add'l DOB	Co-Defendant? YES
Defendant Also Known As	Defendant's First Name	Middle Name	Last Name	Suffix
Race WHITE - W	Ethnicity HISPANIC ORIGIN - H			
Hair Color BLACK - BLK	Eye Color BROWN - BRO			
DNA NO	DNA Location			Weight 150 LBS
FBI Number	MNU Number			Height 5' 04"
Defendant Fingerprinted YES	Fingerprint Classification			

DEFENDANT VEHICLE INFORMATION

Plate #	State	HazMat	Registration Sticker (MM/YY)	Commercial Vehicle?	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
VIN	Year	Make	Model	Style	Color		NO

Office of the Attorney of 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. Pa.R.Crim.P.507.)

Name of Attorney for Commonwealth - Please Print or Type (Signature of Attorney for Commonwealth) (Date)

I, TPR. LUKE MCILVAINE / Ofc Thomas Kesser 729266/13164 / #87
(Name of Affiant - Please Print or Type) (PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of PENNSYLVANIA STATE POLICE, TROOP D, EASTERN INT UNIT / Flw PD PAPSP1A00 / 18A 0231200
(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 is unknown to me and whom I have (herefore designated as John Doe or Jane Doe,

with violating the penal laws of the Commonwealth of Pennsylvania at: 301
(Subdivision Code) 3632 N 3RD ST, PHILADELPHIA CITY
(Place-Political Subdivision)

in PHILADELPHIA County 51 on or about 6/18/2021 AT APPROX. 08:00 HRS
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400524-5	Complaint/Incident Number O1010P716E/PA 2021-823642
Defendant Name	First ZAHID	Middle	Last IGBAL

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.

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 0				
Lead? NO	Offense # 1	Section 7512	Subsection A	PA Statute (Title) 18	Count 1	Grade F3	NCIC Offense Code	UCR/NIBRS CC76
PennDOT DATA (If applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

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

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted thereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every Instance where the communication facility is utilized constitutes a separate offense under this section.

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 0				
Lead? NO	Offense # 2	Section 6111	Subsection A1	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC51
PennDOT DATA (If applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

Statute Description (include the name of statute or ordinance):
DEAL IN PROC UNL ACT/INTENT TO PROMOTE

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did conduct a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represented the proceeds of unlawful activity, THE DEFENDANT acted with the intent to promote the carrying on of the unlawful activity.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400524-5	Complain/Incident Number O1018P716E/PA 2021-823642
Defendant Name	First ZAHID	Middle	Last IGBAL

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.

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 0				
Lead? YES	Offense # 3	Section 911	Subsection B3	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO		Safety Zone NO	Work Zone NO			

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

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, who was employed or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity.

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 0				
Lead? NO	Offense # 4	Section 780-113	Subsection A30	PA Statute (Title) 35	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (if applicable)	Accident Number	Interstate Indicator NO		Safety Zone NO	Work Zone NO			

Statute Description (include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400524-5	Complain/Incident Number O1018P716E/PA 2021-823642
Defendant Name	First ZAHID	Middle	Last IGBAL

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.

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 0				
Lead? NO	Offense # 5	Section 780-113	Subsection A16	PA Statute (Title) 35	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

Statute Description (Include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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 0				
Lead? NO	Offense # 6	Section 780-113	Subsection A30	PA Statute (Title) 18	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA (If applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

Statute Description (Include the name of statute or ordinance):
MANUFACTURE, DELIVERY, OR POSSESSION WITH INTENT TO MANUFACTURE OR DELIVER

Acts of the accused associated with this Offense:

The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A30 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver (NAME OF SUBSTANCE), a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to (NAME AND DEPARTMENT OF PERSON WHO PURCHASED OR RECEIVED), in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400524-5	Complaint/Incident Number O1018P716E/PA 2021-823642
Defendant Name	First ZAHID	Middle	Last IGBAL

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.

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 0				
Lead? NO	Offense # 7	Section 780-113	Subsection A16	PA Statute (Title) 18	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS GS13
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

Statute Description (include the name of statute or ordinance):
INT POSS CONTR SUBST BY PER NOT REG

Acts of the accused associated with this Offense:
The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substances, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfeit substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of a practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substances, Drug, Device and Cosmetic Act.

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 0				
Lead? NO	Offense # 8	Section 6106	Subsection A1	PA Statute (Title) 18	Count 2	Grade F3	NCIC Offense Code	UCR/NIBRS CC81
PennDOT DATA (if applicable)		Accident Number	Interstate Indicator NO	Safety Zone NO	Work Zone NO			

Statute Description (include the name of statute or ordinance):
FIREARMS NOT TO BE CARRIED W/O LICENSE

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did carry a firearm, namely, Glock 19 handgun and 22 ruger handgun, in a vehicle or concealed on or about his person, while outside his place of abode or fixed place of business, w/o a valid and lawfully issued license, in violation of this chapter of the PA Crimes Code.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400624-5	Complaint/Incident Number O1018P716E/PA 2021-823642
Defendant Name	First ZAHID	Middle	Last IGBAL

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.

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 0				
Lead? NO	Offense # 9	Section 6105	Subsection A1	PA Statute (Title) 18	Count 2	Grade F1	NCIC Offense Code	UCR/NIBRS 18
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

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

POSSESSION OF FIREARM PROHIBITED

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, being a person who has been convicted of an offense enumerated in subsection (b), within or without this Commonwealth, regardless of the length of sentence or whose conduct meets the criteria in subsection (c) did possess, use, control, sell, transfer or manufacture or obtain a license to possess, use, control, sell, transfer or manufacture a firearm in this Commonwealth

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				
Lead? NO	Offense # 10	Section 911	Subsection B4	PA Statute (Title) 18	Count 1	Grade F1	NCIC Offense Code 1	UCR/NIBRS CC91
PennDOT DATA (if applicable)		Accident Number		Interstate Indicator NO	Safety Zone NO		Work Zone NO	

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

CONSP TO VIO 911B1, 911B2, 911B3

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, did conspire to violate the provisions of paragraphs (1), (2) or (3) of this subsection.



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400524-8	Complaint/Incident Number O1018P718E/PA 2021-823642
Defendant Name	Defendant's First Name ZAHID	Middle Name	Last Name IGBAL

- 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 1
- 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 statute 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.)

6-16-2021
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date, 06/16/21 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.

32-31
(Magisterial District Court Number)

[Signature]
(Issuing Authority)

Phillip Turner





POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number X400524-5	Complaint/Incident Number O1018F716E/PA 2021-823642
Defendant Name	First ZAHID	Middle	Last IQBAL

AFFIDAVIT of PROBABLE CAUSE

THIS IS AN OFFICE OF ATTORNEY GENERAL PROSECUTION AND THE FOLLOWING CHARGES HAVE BEEN APPROVED BY DEPUTY ATTORNEY GENERAL KARIN JUDGE.

During the month of October 2020, your affiants, members of the Pennsylvania State Police, and the Delaware County Drug Task Force Initiated a narcotics investigation into the Drug Trafficking Organization of Luis LLAMAS. At the direction of investigators and members of law enforcement confidential informants were utilized to complete five (5) controlled purchases of methamphetamine from October 2020 through March 2021, including one controlled purchase for approximately eight ounces of methamphetamine that was made in Upper Darby Township, Delaware County in December of 2020. Throughout the course of our investigation, your affiants and other members of law enforcement have confirmed that Luis LLAMAS is distributing methamphetamine, cocaine, fentanyl/heroin, marijuana and other narcotics in the City & County of Philadelphia, as well as Delaware County and Montgomery County, Pennsylvania and have identified associates within his Drug Trafficking Organization to be distributing narcotics in the City & County of Philadelphia, Delaware County and Montgomery County, Pennsylvania.

In May 2021 investigators engaged in a proactive investigation involving Non-Consensual intercepts of the Drug Trafficking Organization. During the course of the investigation Luis LLAMAS, utilizing cellular telephone numbers 215-341-4072 and 267-344-7027, was found to be distributing methamphetamine, cocaine, fentanyl/heroin, marijuana (including THC infused "edible" products) and ecstasy pills.

Over the course of our investigation your affiants identified several persons within LLAMAS' drug trafficking organization. As a result of intercepted cellular telephone communications and surveillance, your affiants identified Lolyta LEE as LLAMAS' primary source of supply for marijuana and THC infused edible products. LEE, using cellular telephone 484-547

I, TPR. LUKE MCILVAINE */s/ Luke McIlvaine* 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.

[Signature]
(Signature of Affiant)

Sworn to me and subscribed before me this 16th day of JUNE, 2021

Date *[Signature]*, Magisterial District Judge

My commission expires first Monday of January, '18





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400524-5	Complaint/Incident Number O1018P716E/PA 2021-823642
Defendant Name	First ZAHID	Middle	Last IGBAL

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

-1550, was intercepted on both LLAMAS' telephones. LEE made multiple deliveries of marijuana and THC infused product to LLAMAS at his Hope Street address and he met with LEE in Lower Merion Township, Montgomery County on May 15, 2021 to pay her \$10,000 for prior marijuana deliveries.

Hugo HYLAND, using cellular telephone (215) 459-0974, was identified as a person who LLAMAS' trusted to store quantities of controlled substances at his residence located at 97 South Keystone Road, Upper Darby Township, Delaware County. LLAMAS also relied on HYLAND to meet with source(s) of supply to pick up multi-pound quantities of methamphetamine and other drugs.

Juwan WOODS was identified as one of LLAMAS' trusted confederates. WOODS, using cellular telephone (215) 594-0974, was supplied controlled substances by LLAMAS, including cocaine. WOODS would also cook cocaine powder into cocaine base ("crack" or "hard") for LLAMAS. Your affiants ultimately conducted a Court authorized Intercept of WOODS 215-594-0974 telephone facility. Interception began early June 2021. During the Intercept of WOODS' phone, your affiants captured several conversations wherein WOODS made arrangements to sell both powder and cocaine base (crack or hard) to other persons as well as other controlled substances.

On June 2, 2021, a uniformed Pennsylvania State Trooper stopped a vehicle that contained a parcel. Your affiants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your affiants learned through LLAMAS' communications with others, including Kenneth SIMON, that at least part if not all of those 30 pounds were destined for LLAMAS and the members of his organization.

Kenneth SIMON and his wife Tiffany SIMON were integral parts of the LLAMAS drug trafficking organization. Kenneth and Tiffany SIMON together, and independently, came to LLAMAS' residence on North Hope Street to

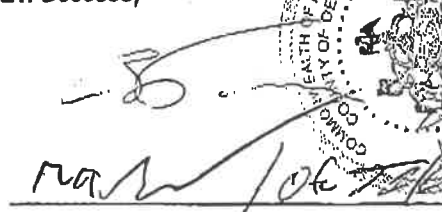
conduct drug related transactions. LLAMAS would also go to the SIMONS' Conlyn Street address to engage in drug related transactions.

After June 2, 2021, LLAMAS was forced to find other sources of methamphetamine and WOODS stepped in to fill that void as WOODS had an alternate source for methamphetamine. WOODS would contact his source on LLAMAS' behalf and WOODS would coordinate multi-pound methamphetamine sales to LLAMAS. LLAMAS would often send or meet HYLAND with WOODS to pick up the methamphetamine. LLAMAS also relied upon HYLAND to deliver multi-pound quantities to distributors within the LLAMAS drug trafficking organization.

Zahid IGBAL, using cellular telephone facility 267-319-2908, was identified as one of LLAMAS' distributors for heroin/fentanyl and methamphetamine. IGBAL would come to LLAMAS' Hope Street address and other locations, to meet LLAMAS to pick up supplies of fentanyl/heroin and other controlled substances for distribution to other persons.

On June 15, 2021 your affiants prepared search warrants for the following locations and vehicles within the City & County of Philadelphia, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 3336 North Hope Street - Philadelphia, PA
2. 2948 Kip Street - Philadelphia, PA.
3. 3218 Tyson Avenue, Philadelphia PA 19149
4. 1422 North 52nd Street., Philadelphia PA 19131.
5. 1721 Conlyn Street, Philadelphia PA 19141
6. 3832 North 3rd Street, Philadelphia PA 19140
7. 101 West Sharpnack Street, Philadelphia PA 19119.
8. 2015 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1FD006533)


 (Signature of Affiant)





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AFFIDAVIT of PROBABLE CAUSE CONTINUATION

9. 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1250 VIN (1HGCV3F94LA004268)
10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900)
11. 2017 Black Nissan Maxima PA reg KXG-4899 VIN (1N4AA6AP5HC445219)
12. 2021 Grey Toyota Tundra ZPY0195 VIN (5TFAY5F10MX007232)
13. 2017 Silver Ford Taurus PA registration LGP8637 VIN (WA1LGAFE1FD006533)

The search warrants were presented to and approved by Philadelphia County Common Pleas Judge Honorable Anne Marie Coyle on June 15, 2021

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Upper Darby Township, Delaware County, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

1. 97 South Keystone Road, Upper Darby Township, Delaware County, PA
2. 2003 Maroon Ford F-150 PA registration ZMK-4067 VIN(1FTRX18W33NA09123)

The search warrants were presented to and approved by the Honorable Kevin F. Kelly, President Judge of the Common Pleas Court of Delaware County.

On June 15, 2021 your affiants prepared search warrants for the following locations and Vehicles within Pottstown Borough and Cheltenham Township, Montgomery, Pennsylvania associated with the investigation into the Drug Trafficking Organization of Luis LLAMAS, Lolyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL

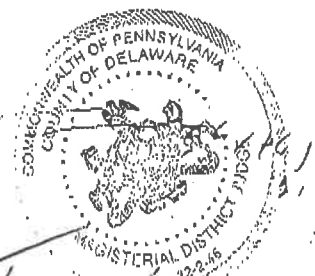
1. 163 Grant Street, Pottstown, Montgomery County Pennsylvania
2. 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania

The search warrants were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Demchick-Alloy on June 15, 2021

On June 16, 2021 shortly after 6:00 A.M., members of the Pennsylvania State Police, Delaware County Drug Task Force, Montgomery County Detectives, and Drug Enforcement Administration executed the aforementioned search warrants. During the search warrant executions in the City & County of Philadelphia, Montgomery County and Delaware County, Pennsylvania, Luis LLAMAS, Juwan WOODS, Zahid IGBAL, and Tiffany SIMON, were located and detained. Officers/Troopers also arrested Michael ARRINGTON and Andre GRANT on separate gun/drug charges.

During the searches of Montgomery County locations, defendants Lolyta LEE and Kenneth SIMON were located. During the course of searching the aforementioned locations and vehicles the following was seized:

1. 3336 North Hope Street - Philadelphia, PA
 1. approximately 5 pounds of Marijuana (field test positive)
 2. approximately 470 grams of Methamphetamine (field test positive)
 3. approximately 12 grams of Cocaine (field test positive)
 4. approximately 145 grams of Fentanyl (field test positive)
 5. 190 Packets of THC Edibles
 6. 334 individual dosages of Heroin stamped "Venom" (field test positive)
 7. 68 individual dosages of Heroin stamped "Apple Jacks"(field test positive)
 8. 120 individual dosages of Heroin stamped "Buffalo" (field test positive)
 9. 68 individual dosages of Heroin stamped "Skechers" (field test positive)
 10. 92 Individual dosages of Heroin stamped "PS5" (field test positive)
 11. Approximately \$45,000 of US Currency
 12. Glock 19 .9MM bearing Serial Number: MUN578
 13. Five 5 cellular telephones
2. 2948 Kip Street - Philadelphia, PA.
 1. Indicia of ownership - LLAMAS
3. 3218 Tyson Avenue, Philadelphia PA 19149
 1. 29 packages of THC Infused edible products



[Handwritten Signature]
 (Signature of Affiant) [*]



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400524-6	Complaint/Incident Number O1016P716E/PA 2021-823642
Defendant Name	First ZAHID	Middle	Last IGBAL

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

4. 1422 North 52nd Street., Philadelphia PA 19131

1. Four (4) pounds of Marijuana
2. 15 Packets of THC Edibles
3. 1,638 New / Unused THC Edibles Bags
4. Glock 22 40 Caliber bearing Serial Number: BPAE148
5. Silver/Black Taurus G2C 9MM Serial Number: TMU87326
6. Black Taurus PT809 9MM Serial Number: TGR69871

5. 1721 Conlyn Street, Philadelphia PA 19141

1. A large amount of US currency was found in different locations within the house totaling \$24,260.00.
2. A digital scale with used vials were found in a purse hanging on a closet door.
3. In an additional purse hanging on the closet door a Black Smith & Wesson handgun was recovered with serial number CTM7753.
4. A money counter
6. Assorted drug packaging and trafficking equipment to include but not limited to: rubber bands, unused sandwich bags, green shrink wrap, 2 clear measuring cups with residue, electronic scale, coffee grinder, metal mesh strainer, and a stamp kit labeled 1(heart).

6. 3632 North 3rd Street, Philadelphia PA 19140

1. One Ruger .22 Caliber pistol and loaded magazine (Serial Number: 380746594)
2. One stolen Glock 19 9mm pistol and loaded magazine (Serial Number: ACDE324/NCI G244911125)
3. 44 (approximately 44 grams) bundles of plastic bags containing a powder substance. (field tested positive for fentanyl)
4. Approximately 27.8 grams of suspected crystal methamphetamine contained in a plastic bag. (field tested positive for methamphetamine)
5. \$1,175.00 in United States Currency
6. One small clear plastic bag containing suspected cocaine (approximately 0.5 grams) (field test positive)

(IGBAL is person not to possess having a prior felony drug trafficking conviction)

7. 101 West Sharpnack Street, Philadelphia PA 19119.


1. Pistol Sig P250- loaded with 1 chambered
2. Pistol Glock 17 - stolen
3. Romarm Cuglr Rifle (AK style)
4. Various packaging to include cocaine and cut
5. In excess of 500 grams of cocaine (field test positive)
6. Six (6) ounces of suspect crack cocaine (field test positive)
7. Two (2) ounces suspect heroin
8. Approximately 300-400 grams of cutting agents
9. Approximately 30 pounds of marijuana and marijuana derivatives
10. Various packaging and drug paraphernalia


8. 163 Grant Street, Pottstown, Montgomery County Pennsylvania

1. 188 Packets of THC Edibles
2. 13 THC infused soda bottles
3. Numerous THC vape cartridges
4. 20 grams of marijuana
5. Numerous new/unused Ziploc and vacuum sealed bags
6. \$37,290 of US Currency
7. Four (4) cellular telephones
8. Four (4) vehicles

9. 2136 Mathers Way, Cheltenham Township, Montgomery County, Pennsylvania.

1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweat pants belonging to Kenneth Simon.





 (Signature of Affiant) [x]



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number	Date Filed	OTN/Live Scan Number X400524-5	Complaint/Incident Number 01018P716E/PA 2021-823642
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AFFIDAVIT of PROBABLE CAUSE CONTINUATION

10. 97 South Keystone Road, Upper Darby Township, Delaware County

1. One (1) clear knotted bag containing a white powdery substance of suspected cocaine (field test positive).

2. One (1) clear Ziploc bag containing suspected ecstasy.

Orange iron man stamped pill (19)

Red iron man stamped pill (4)

Blue iron man stamped pill (3)

The suspected pills were field tested via trunarc at PSP Philadelphia and found to be Diphenidine.

3. A silver/black Smith & Wesson SD40 VE Serial # FYB6792 containing 13 rounds of .40 caliber Blazer FMJ ammunition was located on top of the hutch.

4. Indicia of ownership/occupancy in name of Hugo HYLAND.


5. One (1) Black vacuum sealed bag containing approximately 1lb of suspected marijuana

6. Blazer .40 caliber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All seized items were seized and entered into evidence at the Pennsylvania State Police barracks - Troop K, Philadelphia. We certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

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