06/16/2021 18:50

#612 P.062/094

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Magislerial Qistrict Num	ber: 32-2-	48		DEFE	NDAN	VT:	(A	AME and A	ADDRESS)		
MDJ Hon. STROHL,	WALTER A			HUGO					HYLAN	D	
Address: 27 S PENA				First Na	me		Middle	Nemu	Last Na	718	Gen
Address: 27 S PENN LIMA, PA			•	II.		ONE ST,					
Telephone: (610) 665-				UPPER	2 DAR	BY, PA	19062				
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Dacket Number	0-21	Date File		Scan Num	- Pedi		aint/Incident N 3 P71BE/PA 2 0		6	Request La	ab Services?
	of Birth 8/1989	POB PA - US	A			Add'I C		YE		?	
Defendant Also Kno	wn As	efendant's F	irst Name	Middle	Nam	Ю	L	Last Name			Suffix
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Hair Color BLACK - BLK					E	ye Color	r				
DNA NO	DNA Loc	cation				,	Dito		,	Weight 170 LB	
FBI Number			`	MNUN	umbe	вг				Height	13
Defendent Fingerp	rinted Fil	ngerprint Cli	assification						******	5' 10"	
	00 \$100 D	entrikane.	NOW NAMED EFER	DANT YE	HICL	E INFO	RMATION A	17/19/18	40.547.5488		MARCE ETC
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VIN		Year Me	ake	M	lodel	-	7	Style		Color	same as Def
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Office of the Attorn The attorney for the talling, Pa.R.Crim.P.60	Commonwe 7.)	aith may req	uire that the complair	nl, errest wa	mant	affidavit,		roved by the	e attorney for	r lhe Commonwe	ealth prior to
Name of Allorney for	W			ignalure of A	Allorn	-	mmonwealth)			(Dale)	
Name of Affiant -	VAINE /6/ Please Prin	tor Type)	is Kener 72	9266/13164 PSP/MPOE	! TC - /		#87 Affiant ID Num	iber & Badg	s #)		
of PENNSYLVANIA (Identify Depart	STATE PO	OLICE, TROC ency Represe	OP O, EASTERN INT Inled and Political Sul	UNIT / F	อใบอ	ff PD		PAPSP14 (Police A	oncy ORI N	40231200 umber)	ri.
do hereby state; (ch	eck appro	priate box)					9				
l. 🕝 I accuse the	авоче па	med defend	lant who lives at the	address s	set fo	rth abov	'e				
l accuse the	defendan	t whose nar	ne is unknown to m	ie but who	is de	scribed	as .				
[] I accuse the	defendar	nt whose na	me and popular de	signation o	or nic	kname l	s unknown lo	me and w	hom I have	therefore des	ignated
as John Do	e or Jane I	Doe.									
with violating the pa	anal laws o	of the Comm	nonwealth of Penns	ylvania at:	1	111					
					_	Code)	97.8 KEYSTO (Place-Politica			TWP	
in <u>DELAWARE</u>	ı	County	<u>23</u> on (County Code)	or about		<u>/16/2021</u> Offense D	AT APPROX. (06:00 HRS			

06/16/2021 18:50

#612 P.083/094



Docket Number	r	Date F	fled	OTN/Li	ve Scan	Number	Compla	Invincider	nt Number 2021-823726	
Defendant Name		First HUGO			197	Middle	Olular	718E/PA	Last HYLAND	
The acts committed I	by the accused se, each offense	are des	cribed below	with eac	h Act of ogloally.	Assembly o	r statute a	allegedly v	riolated, if appropriate	. Wheл there is
(Set forth a brief sum allegedly violated, wi ordinance(s) allegedl	thout more, is r	cts suffic not suffic	clent to advise clent. In a sum	the defe	endant o ase, you	f the nature must cite th	of the offe a specific	ense(s) ch section(s	narged. A citation to th) and subsection(s) o	ne statute(s) f the statute(s) or
Inchoate Offense	Altempt 18 901 A		Solicitetia 18 902 A			nspiracy 8 903	Numbe 0	r of Victim	s Age 60 or Older	
Lead? Offense # 1	Section 911		Subsection B3	98	PA Stat	ule (Title)	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
PennDOT DATA (If applicable)	Acciden Number	ž				Interstate II NO	ndicator	Safety Z	ona	Work Zone NO
Statute Description (Inc CORRUPT ORGAN							650			
participate, directi	y or Indirectly	, in the	conduct of a	auch en	terpris	o's affairs ti	hrough a	pattern	nterprise, did cond of racketeering acti	uct or vity.
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		+		,						n.
Inchoate Offense	Attempt 18 901 A		Solicitation 18 902 A		1	nspiracy 9 903	1		s Age 60 or Older	14
NO 2	Section 7512		Subsection A		PA Statu 18	ite (Title)	Count 1	F3	NCIC Offense Code	UCR/NIBRS CC75
PennDOT DATA	Number	i .				Interstate In NO	dicator	Safety 20 NO	one	Work Zone NO
Statute Description (incl CRIMINAL USE OF	ude the name of COMMUNICAT	Flatule of	or ordinance): .CILITY					,		·V
Acts of the accused ass IN.THAT, on or abo or attempted there. Controlled Substar separate offense un	ut sald date, of any crime v ice, Drug, Dev	THE DE vhich c vice and	FENDANT di	felony ι	ınder ti	ils title or u	nder the	act of A	pril 14. 1972, known	as The
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06/16/2021 18:51 #612 P.084/094



Docket Number	Date Filed UTN/Live Scan Number Complain/Incident Number O1018P718E/PA 2021-823726									
Defendant Name		Firet HUGO)			Middle			Last HYLAND	
The acts committed more than one offen	by the accused se, each offens	are de	scribed below v d be numbered	with eac	ch Act of logically,	Assembly or	statule a	illegedly	violated, if appropriate	. When there is
Inchoate Offense	Attempt 18 901 A		Solicitation 18 902 A		Direction of the control of the cont	nspiracy 8 903	Numbe	r of Victir	ns Age 60 or Older	
Lead? Offense # NO 3	Section 5111		Subsection A1		PA Statu	ite (Title)	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC51
PennDOT DAT	Number	175				Interstale In	dicator	Safety 2	Zone	Work Zone NO
Statute Description (in DEAL IN PROC UN	clude the name of IL ACT/INTENT	fefalule TO PR	or ordinance): OMOTE			29		,		1
Acts of the accused a										
IN THAT, on or at including stolen (out said date, or illegally obta	THE D alned a	EFENDANT d Property, repre	lid con esente	duct a fi d the pro	nancial trai sceeds of u	nsaction nlawful :	with kn activity.	owledge that the pro	perty involved,
Intent to promote	the carrying o	n of th	e unlawful ac	tivity.					THE OLI CROANT &	oted with the
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Inchoale Offense	Attempt		Solicitation			rspiracy	Number	of Victin	ns Age 60 or Older	
Lead? Offense #	18 901 A Section		18 902 A Subsection		PA Statu	te (Title)	Count		NCIC Offense Code	UCR/NIBRS
PennDOT DAT/ (If applicable)	780-113 Accident		A30		36	Interstate In	dicator	F Safety 2	one	CS13 Work Zone
Statute Description (in-	lude the name of	statute	or ordinance):			NO		NO		NO
MANUFACTURE, D				INTENT	TO MAI	NUFACTUR	E OR DE	LIVER		
IN THAT, on or ab	out said date,	THE DI	EFENDANT, n	ot beir	ng regiet	ered under	the Con	trolled :	Substance, Orug, De	vice and
Cosmetic Act, nor	a practitioner	registe	red or license	ed by t	he appro	priate Stat	e board.	did kno	wingly manufacture e, or knowingly cres	deliver, or
possess with inter	nt to deliver, a	counte	erfeit controlle	ed sub	stance t	o (NAME Al	ND DEP/	ARTMEN	IT OF PERSON WHO	PURCHASED
OR RECEIVED), In	violation of S	action	780-113(a)(30) of the	e PA Coi	ntrolled Sul	bstance,	Drug, D	evice and Cosmetic	Act
			5.						•	
15										

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Defendant Name First HUSO				Date F	le Filed OTN/Live Scan Number			Complaint/Incident Number O1018P719E/PA 2021-823726				
Inchosts Offense Category Subsection 18 901 A 18 902 A 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 18 903 1	Defenda	nt Name		First HUG0)			Middle			Last	
Lead? Offense # Section Subsection PA Statute (Title) Count Grade Not Offense Code UCR/NIBRS CS13 Not Zone Not	The acts more tha	committed l	by the accused se, each offens	are de e shoul	scribed below v d ba numbered	with eac	ch Act of ologically.	Assembly or	statute a	illegedly	violated, if appropriate	e. When there is
Interestate Indicator Safety Zone Work Zone No				١.	0.00 0.00 0.00 0.00		1 1	8 903	Numbe	r of Victir	ns Age 60 or Older	
Inchoate Offense Attempt Solicitation Description Country Device and Cosmetic Act. Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or Ilcensed by the appropriate State Board, did knowingly or Inlendate controlled or countrefiel aubstance, which was not obtained directly from, or pursuant to, a valid prescription order or order of practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act. Inchoate Offense Attempt Solicitation Device and Cosmetic Act. Solicitation Solic	NO	6	780-113					7.00	1	M	350,500	
Introduct Offense Introductory of the secured associated with bis Offense INTRODUCTION of the PACONTROLLAR Age 60 or Older Inchaste Offense INTRODUCTION OF ACCIONATION OF	Shapping 1	applicable)	Number						dicator		Zone	
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 counterfelt substance, which was not obtained directly from, or pursuant to, a valid prescription order or order of practitioner, in violation of Section 780-113(a)(16) of the PA Controlled Substance, Drug, Device and Cosmetic Act. Inchoate Offense	INT POS	SS CONTR	SUBST BY PE	f statule R NOT	or ordinance): REG							
Lead? Offense # Section 780-113 Subsection PA Statute (Title) Count M No CC Offense Code UCR/NIBRS CS13 PenDOT.DATA Accident Number Interstate Indicator No	Cosme	tic Act, nor led or coun	a practitione; iterfelt substa	r regisi Ince, w	tered or licens hich was not	eed by obtain	the applied	ropriate Stat tly from, or	te Board pu rs uar	i, did kn it to. a v	owingly or intention	ally possess a der or order of a
Lead? Offense # Section 780-113 Subsection PA Statute (fittle) Count M No CCG Mense Code UCR/NIBRS CS13 PenDOT DATA Accdent Number No												
Lead? Offense # Section 780-113 Subsection PA Statute (Title) Count M No CC Offense Code UCR/NIBRS CS13 PenDOT.DATA Accident Number Interstate Indicator No												
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Lead? Offense # Section 780-113 Subsection PA Statute (fittle) Count M No CCG Mense Code UCR/NIBRS CS13 PenDOT DATA Accdent Number No												
Pendot Data Accident Interstate Indicator Safety Zone Work Zone NO NO NO NO NO NO NO N			Attornat		Calculate		FD 60		IN.	- 33 1		
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 Coemetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfelt 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.			18 901 A		18 902 A		18	903				
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 Coemetic Act, nor a practitioner registered or licensed by the appropriate State Board, did knowingly or intentionally possess a controlled or counterfelt 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 Coemetic Act.	Lead?	Offense#	18 901 A Section 780-113		18 902 A Subsection		PA Statu	e (Title)	Count 1	Grade M	NCIC Offense Code	CS13
The DEFENDANT did conspire with another person or persons to commit a crime 780-113 A16 IN THAT, on or about sald 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 counterfelt 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.	Lead? NO Penn (if a	Offense # 6 DOT:DATA pplicable)	18 901 A Section 780-113 Accident		18 902 A Subsection A16		PA Statu	3 903 Ite (Title) Interstate Ind	Count 1	Grade M Safety 2	NCIC Offense Code	Work Zone
	Lead? NO Penn (if a Sustute De INT POS	Offense # 6 DOT:DATA pplicable) escription (inc S CONTR S	18 901 A Section 780-113 Accident Number lude the name of	i. statute	18 902 A Subsection A16 or ordinance): REG		PA Statu	3 903 Ite (Title) Interstate Ind	Count 1	Grade M Safety 2	NCIC Offense Code	Work Zone

06/16/2021 18:51

#612 P.086/094



POLICE CRIMINAL COMPLAINT

			رحون عبر	~				
Docket Number		Date Filed	OTN/Live Scan	Number	Compla O1018F	nt/inclde 718E/P	ent Number A 2021-823726	
Defendant Name		First HUGO		Middle			Last HYLAND	
The acts committed more than one offens	by the accused se, each offens	are described below to should be numbered	with each Act of I chronologically.	Assembly or	statute a	illegedly	violated, if appropriate	. When there is
Inchoate Offense	18 901 A	Solicitation 18 902 A	111 7 1 17 1	nspiracy 8 903	Numbe	r of Victi	ms Age 60 or Older	
NO 7	Section 780-113	Subsection A30		ute (Title)	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
(if applicable)	Number	i e		Interstate In	dicator	Safety NO	Żone	Work Zone NO
Statute Description (Inc	clude the name o	f statute or ordinance): POSSESSION WITH	INTENT TO MA	ANUFACTUR	E OR DE	LIVER		
Acts of the accused as	socialed with this	Offense:						
or deliver (NAME (counterfelt contro	DF SUBSTAN Iled substanc	CE), a controlled sul	batance, or know PARTMENT O	owingly crea F PERSON V	ate, deliv NHO PU	er or pe	possess with intent possess with intent to ED OR RECEIVED), i	deliver, a
	28		ii.	ä	a a		;	
Inchoate Offense	Attempt 18 901 A		1 1	nspiracy 8 903	Number	of Victir	ns Age 60 or Older	
Lead? Offense # NO 8	Section 780-113	Subsection A16	PA State	ute (Title)	Count 1	M	NCIC Offense Code	UCR/NIBRS CS13
PennDOT DATA	Number	<u>; </u>		Interstate Inc	dicator	Safety 2 NO	Zone	Work Zone NO
Statute Description (Inc INT POSS CONTR :	lude the name of SUBST BY PER	statule or ordinance): R NOT REG			160	2		
Acts of the accused as								
The DEFENDANT	did conspire v	vith another person	or persons to	commit a cri	ime 780	-113 A1	8 IN THAT, on or abo	ut sald date

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 Coametic Act.

06/16/2021 18:52 #612 P.087/094



			Date F	te Filed OTN/Live Scan Number			Number	Complaint/Incident Number 01018P718E/PA 2021-823726			
Defend	ant Name		First HUGO)			Middle			Last HYLAND	
The act	s committed an one offens	by the accused se, each offens	are de should	scribed below d be numbered	with ead	ch Act of logically.	Assembly or	statule a	allegedly	violated, if appropriate	. When there is
-	ale Offense	18 901 A		Solicitation 18 902 /			nspiracy 8 903	Number of Victims Age 60 or Older			
Lead? NO	Offense #	Section 6105		Subsection A1			ite (Title)	Count	Grade F1	NCIC Offense Code	UCR/NIBRS
10-7 11)	nDOT DAT/ applicable)	Acciden Number	1				Interstate In	dicator	Safety 2	опа	Work Zone
Statule I	Description (In: 1981ON OF F	dude the name of	relatule HIBITE	or ordinance): D							
supse	ction (b), wi ction (c) did	thin or withou	t this (, contr	Commonweal ol, sell, trans	th, reas	ardless (of the lenati	n of seni	tence or	an offense enumer whose conduct me ossess, use, contro	ete the criteria in
		w.							ķ.		
Incho	ale Offense	Attempt 16 901 A		Solicitatio			nspiracy 3 903	Number	of Victim	s Age 60 or Older	
МО	10	Section 6106		Subsection A1			te (Title)	Count	Grade F3	NCIC Offense Code	UCR/NIBRS CC61
Pen (I(nDOT DATA applicable)	Accident	\				Interstate Inc	dicator	Safety Z NO	one	Work Zone
FIREAR Acts of th IN THA concea	MS NOT TO te accused as: T, on or abo iled on or ab	lude the name of BE CARRIED sociated with his out said date, rout his person of this chapt	WIO LI Offense THE Di n, whil	CENSE : EFENDANT di le outside his	place	of abode	m, namely, e or fixed pl	Smith a ace of b	nd Wess usiness	son .40 Handgun, in , w/o a valid and law	n Vahicle os
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06/16/2021 18:52 #612 P.088/094



Docket	Number		Date Filed OTN/Live Scan Number			Number	Complaint/Incident Number 01018P718E/PA 2021-823726				
Defend	ant Name		First HUGO				Middle	i i		Last HYLAND	
The act	s committed an one offens	by the accused se, each offensi	are desc should	ribed below v beredmun be	vith each chronolo	Act of ogically.	Assembly o	r statule a	llegedly	violated, if appropriate	. When there is
	ate Offense	16 901 A		5 Solicitation 18 902 A			nspiracy 3 903	Number	of Victir	ns Age 60 or Older	91
Lead? NO	Offense #	Section 911		Subsection 34	T	A Statu 18	ile (Title)	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
14 (if	applicable)	Number	·.;				Interstate I	ndicator	Safety NO	one	Work Zone NO
CONS	Description (int P TO VIO 91 1	lude the name o	i alalule o 1 93	r ordinance):							
Acts of	the accused as	sociated with this	Offense:							1001001	
IN THA	AT, on or about on a but of the contract of th	out said date,	THE DE	FENDANT, o	ild cons	pire to	violate the	provisio	ns of p	aragraphs (1), (2) or	(3) of this
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790						*	8			•	
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		79									
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#612 P.089/094



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed		Scan Number		ncident Number 3E/PA 2021-823726	
Defendant Name	Defendant's First N HUGO	lame	Middle Nam	е	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 faisification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through &
- I certify that this filing complles 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, swom to before the issuing authority, and attached.) -16-2021 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. 3-1-31 (Magisterial District Court Number)

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#612 P.090/094



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complain/Incident O1018P718E/PA 2		
Defendant Name	First -	Middle		Lest 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, cocains, 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, fentany/heroin, marijuana (including THC infused "edible" products) and ecstasy pills.

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

FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE

CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CA THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND	CONFIDENTIAL INFOR	ACCESS POLICY OF MATION AND
8,	M 9 (Signaly	fe of Affiant)
Sworn to me and subscribed before me this day of	JUNIS	- tun
My commission expires first Monday of January,	Magisterial District J	udge of pervi
	V 6 63	**************************************

I, TPR. LUKE MCILVAINE

INFORMATION AND BELIEF.

06/16/2021 18:53

#612 P.091/094



POLICE CRIMINAL COMPLAINT AFFIDAVIT CONTINUATION PAGE

Dacket Number	Date Filed	OTN/Live Scan Number	Compleint/Incident Number O1018P718E/PA 2021-823726	
Defendant Name	First HUGO	Middle	Lest 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 cocalne, WOODS would also cook cocalne powder into cocalne base ("crack" or "herd") for LLAMAS. Your afflants ultimately conducted a Court authorized intercept of WOODS 216-594-0974 telephone facility. Interception began early June 2021, During the Intercept of WOODS' phone, your afflants captured several conversations wherein WOODS made arrangements to sell both powder and cocalne 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 afflants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your afflants 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.

Zahld 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 Zahld 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, Philadephia PA 19141
- 6. 3632 North 3rd Street, Philadelphia PA 19140
- 101 West Sharpnack Street, Philadelphia PA 19119.
- 2015 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1FD006593)

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POLICE CRIMINAL COMPLAINT AFFIDAVIT CONTINUATION PAGE

	OTN/Live Scan Number	,	
First HUGO	Middle	Last HYLAND	
	First HUGO	First Middle	First Middle Last HUGO 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)
- 2017 Black Nissan Maxima PA reg KXG-4899 VIN (1N4AA6AP5HC445219) 11.
- 2021 Grey Toyota Tundra ZPY6195 VIN (5TFAY5F10MX007232) 12.
- 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 Covie on June 15, 2021

On June 15, 2021 your afflants 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, Lolyfa 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 Marcon 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 afflants 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 Luie LLAMAS, Lolyte 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 warrante were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Damchick-Alloy on June 15, 2021

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From:



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

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 Tilfany 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 selzed:

3336 North Hope Street - Philadelphia, PA 1.

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 "Skethers" (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
- 3218 Tyson Avenue, Philadelphia PA 19149 3.
 - 1. 29 packages of THC Infused edible products
- 1422 North 52nd Street., Philadelphia PA 19131 4.
 - 1. Four (4) pounds of Marijuana
 - 2. 16 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: TMU87328
 - 6, Black Taurus PT809 9MM Serial Number: TGR69871
- 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 handing on a closet door.
- 3. In an additional purse hanging on the closet door a Black Smith & Weeson 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).
- 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 position) 4. Approximately 27.8 grams of suspected crystal methamphetamine contained in a plastic bag. (field tested positive
- 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

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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

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

- 101 West Sharpnack Street, Philadelphia PA 19119.
- 1. Pistol Sig P250- loaded with 1 chambered
- 2, Platol Glock 17 stolen
- 3. Romarm Cugir Rifle (AK style)
- 4. Various packaging to include cocains 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
- B. Approximately 300-400 grams of cutting agents
- Approximately 30 pounds of marijuans and marijuans 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
- One (1)clear knotted bag containing a white powdery substance of suspected cocaine (field test positive).
 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 selzed items were seized and entered into evidence at the Pennsylvania State Police barracks – Troop K, Philadelphia. We certify that this filing compiles 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.

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) 565-4110

DEFENDANT: (NAME and ADDRESS)

JUWAN ROBERT WOODS
First Name Middle Name Last Name Gen

3218 TYSON AVE,
PHILADELPHIA, PA 19149

Telephone: (610	0) 565-4110					PHILADI	ELPI	HIA, PA	19149					
					NC	IC Extrad	itio	n Code	Туре					
NCIC Extrac	dition Code	Туре	1 - FEL	ONY FUL	L				···					
					DEFENDAN"	T IDENTIF	FICA	MOITA	NFORMATIC	ON				
Docket Num			Date	Filed	OTN/Live S X400522-3	can Numb	oer	0101	laint/Incident 8P721E/PA 2		626		Request Lab YES	Services?
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Defendant Als	so Known A	s Def	endant	's First Nai	me	Middle N	Vam	ė		Last Nar	ne		S	uffix
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-	FBI Number					MNU Nu	ımbe	∍r					Height	
Defendant F	ingerprinted	Fing	erprint	Classifica	tion								6' 00"	
YES					DEFEND	ANT VEH	IICI	E INEC	RMATION					
Plate #	Sta	ate	HazM	at Regis	tration Sticker				rcial Vehicle?	School	Veh.	Oth. NCIC	Veh. Code	
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filing. Pa.R.Cri	m.P.507.)													
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in PHILADE L	<u>LPHIA</u>	C	ounty	<u>51</u>	оп о	r about	.06	6/16/202	1 AT APPRO	X. 06:00 H	RS			

(Offense Date)

(County Code)

AOPC 412A - Rev. 07/18



Docket	Number			Date F	iled	OTN/Li X4005		can Nu	ımber	Complaint/Incident Number O1018P721E/PA 2021-823626			
Defenda	ant Name			First JUWA		74.1000		Mid	iddle OBERT	010101	1212/17	Last WOODS	
The act	s committed	by the a	accused	are des	scribed below	with eac	ch Act	t of As		statute a	llegedly	violated, if appropriate	When there is
					d be numbered cient to advise		_	-	ne nature d	of the offe	nse(s) c	harged. A citation to th	ne statute/s)
allegedly		ithout m	nore, is n									s) and subsection(s) of	
II.	ate Offense	[1	Attempt 18 901 A		Solicitati 18 902 /			18 9		0	r of Victir	ms Age 60 or Older	
Lead? YES	Offense #	Section 911			Subsection B3		PA S 18	Statute		Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
(if	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												
	the accused as												
												enterprise, did cond of racketeering acti	
	•	•	•				•				•	5	,
Incho	ate Offense		ttempt		Solicitati			Consp		Number	of Victir	ns Age 60 or Older	
Lead?	Offense #	Section	18 901 A n		18 902 A Subsection	4		18 9 Statute		Count	Grade	NCIC Offense Code	UCR/NIBRS
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CONSF	P TO VIO 911	1B1, 91	1B2, 911	1B3						_ 5			
	the accused as AT, on or abo					did cor	nspire	e to vi	olate the	provisio	ns of pa	aragraphs (1), (2) or	(3) of this
subsec			······································		,		1				[(0) 01 0110

AOPC 412A - Rev. 07/18



Docket Number	Date Filed	OTN/Live Scan X400522-3	Number	Complaint/Incident Number O1018P721E/PA 2021-823626			
Defendant Name	First JUWAN		Middle ROBERT			Last WOODS	
The acts committed by the accused more than one offense, each offens	are described below			statute a	llegedly	violated, if appropriate	. When there is
Inchoate Offense Attempt 18 901 A	Solicitati 18 902		nspiracy 8 903	Number 0	of Victir	ns Age 60 or Older	
Lead? Offense # Section 7512	Subsection A		ute (Title)	Count 1	Grade F3	NCIC Offense Code	UCR/NIBRS CC75
PennDOT DATA Accident (if applicable) Number		-	Interstate Inc	dicator	Safety 2	Zone	Work Zone
Statute Description (include the name of CRIMINAL USE OF COMMUNICA	of statute or ordinance):						Is.
Acts of the accused associated with thi	s Offense:						
IN THAT, on or about said date, or attempted thereof any crime Controlled Substance, Drug, De separate offense under this sec	which constitutes a evice and Cosmetic	a felony under t	his title or u	nder the	act of	April 14, 1972, knowi	n as The
Inchoate Offense Attempt	Solicitati		nspiracy	Number	of Victin	ns Age 60 or Older	
Lead? Offense # Section 5111	Subsection A1		8 903 ute (Title)	Count	Grade F1	NCIC Offense Code	UCR/NIBRS
PennDOT DATA Acciden (if applicable) Number	t	110	Interstate Ind	dicator	Safety Z	Zone	Work Zone
Statute Description (include the name of	of statute or ordinance):		NO		NO		NO
DEAL IN PROC UNL ACT/INTENT Acts of the accused associated with this IN THAT, on or about said date, including stolen or illegally obta intent to promote the carrying of	s Offense: , THE DEFENDANT (ained property, repr	resented the pro	inancial tran oceeds of ur	saction nlawful a	with knoctivity,	owledge that the pro THE DEFENDANT ac	perty involved, eted with the



Defendant Name	Docket Number Date Filed				X400522-3			O1018P721E/PA 2021-823626			
Defendant Name First 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									Last WOODS		
The acts committed to more than one offens	e, each offens	are des e should	be numbered	chrono	logically.					. When there is	
Inchoate Offense	Attempt 18 901 A		Solicitation 18 902 A			nspiracy 3 903	Number 0	of Victir	ns Age 60 or Older		
Lead? Offense # 5	Section 780-113		Subsection A30	•	PA Statu 35	ite (Title)	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13	
PennDOT DATA (if applicable)	Number					Interstate Inc	dicator	Safety 2 NO	Zone	Work Zone NO	
Statute Description (inc MANUFACTURE, D				INTEN	T TO MA	NUFACTUR	E OR DE	LIVER		***	
Cosmetic Act,nor a possess with inter possess with inter	out said date, a practitioner nt to manufac nt to deliver, a	THE DI registe ture or a counte	EFENDANT, i red or licens deliver (NAM erfeit control	ed by 1 IE OF S led sub	the appro SUBSTAN bstance t	opriate State NCE), a con to (NAME Al	e board, trolled s ND DEP	did kno ubstand ARTME	Substance, Drug, De owingly manufacture ce, or knowingly crea NT OF PERSON WHO Device and Cosmetic	e, deliver, or ate, deliver or O PURCHASED	
Inchoate Offense	Attempt		Solicitatio			nspiracy	Number 0	of Victin	ns Age 60 or Older		
Lead? Offense # NO 6	18 901 A Section 780-113		Solicitation 18 902 A Subsection A16			3 903		Grade M	NCIC Offense Code	UCR/NIBRS CS13	
Lead? Offense # 6 PennDOT DATA (if applicable)	Section 780-113 Acciden Number	t	18 902 A Subsection A16		18 PA Statu 35	3 903	Count 1	Grade	NCIC Offense Code	UCR/NIBRS CS13 Work Zone NO	
Lead? Offense # NO 6 PennDOT DATA	Section 780-113 Acciden Number lude the name of	f statute o	18 902 A Subsection A16		18 PA Statu 35	3 903 Ite (Title)	Count 1	Grade M Safety 2	NCIC Offense Code	CS13 Work Zone	

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Docket Number	Date Filed	OTN/Live X400522		Number	Complaint/Incident Number O1018P721E/PA 2021-823626					
Defendant Name	First JUWAN			Middle ROBERT			Last WOODS			
The acts committed by the accused more than one offense, each offense	are described below e should be numbered	with each I chronolog	Act of gically.	Assembly or	statute a	llegedly	violated, if appropriate	. When there is		
Inchoate Offense Attempt 18 901 A	Solicitati			nspiracy 8 903	Number 0	of Victin	ns Age 60 or Older			
Lead? Offense # Section 780-113	Subsection A30		A Statu 8	ute (Title)	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13		
PennDOT DATA Acciden (if applicable) Number				Interstate Inc	dicator	Safety 2	Zone	Work Zone NO		
Statute Description (include the name of MANUFACTURE, DELIVERY, OR		INTENT	ГО МА	NUFACTURE	E OR DE	LIVER				
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 Attempt 18 901 A	Solicitati			nspiracy 8 903	Number 0	of Victin	ns Age 60 or Older			
Lead? Offense # Section 780-113	Subsection A16	P. 1		ute (Title)	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13		
PennDOT DATA Acciden (if applicable) Number				Interstate Inc	dicator	Safety 2 NO	Zone	Work Zone NO		
Statute Description (include the name of INT POSS CONTR SUBST BY PE										
Acts of the accused associated with this The DEFENDANT did conspire to THE DEFENDANT, not being regregistered or licensed by the apsubstance, which was not obtain of Section 780-113(a)(16) of the	with another person gistered under the C propriate State Boa ned directly from, o	Controlled ord, did kr or pursuar	l Subs nowing nt to, a	tance, Drug gly or intenti valid presc	, Device onally p ription o	and Co ossess order or	smetic Act, nor a pra a controlled or cour	actitioner nterfeit		



Docket Number	Date Filed	OTN/Live Scan X400522-3	Number	Complaint/Incident I O1018P721E/PA 2	
Defendant Name	Defendant's First Nar JUWAN	ne	Middle Name ROBERT	Э	Last Name WOODS

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered 1 through 6
- 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 here were contrary to the Act(s) of the Assembly, or in violation	eafter, were against the peace and dignity of the Commonwealth of Pennsylvania and on of the statute cited.
(Before a warrant of arrest can be issued, an affida and attached.)	vit of probable cause must be completed, sworn to before the issuing authority
6-16-2021	page / de TEL
(Date	(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	ne a warrant can be issued.
(Magisterial District Court Number)	(Issuing Authority)
·	



Docket Number	Date Filed	OTN/Live Scan Number X400522-3		Complaint/Incident I	
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

FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CATHE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND	CONFIDENTIAL INFORMATION AND
	Mostle Affiant)
Sworn to me and subscribed before me this day of	
Date	, Magisterial District Judge
My commission expires first Monday of January,	

I, TPR. LUKE MCILVAINE Of 16555

INFORMATION AND BELIEF.



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, Philadephia 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)



Docket Number	Date Filed	OTN/Live Scan X400522-3	Number	Complaint/Incident O1018P721E/PA 2		
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)
- 2017 Silver Ford Taurus PA registration LGP8637 VIN (WA1LGAFE1FD006533) 13.

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:

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



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



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

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: MONTGOMERY Magisterial District Number: 32-2-48				3		POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.					
		-		DEFEND	ANT:		(NAME	nd ADDR	RESS)		
MDJ Hon. STROHL, V	WALTER A	4	ę.	KENNETH	1	J.			SIMON		
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LIMA, PA				208 PARK		•					
Telaphone: (610) 585-4	110			CHELTEN	idani, P	A 19012				1//	
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Docket Number



Docket Number		Date F	Date Filed OTN/Live Scan Number X400518-6		Number	Complaint/Incident Number O1019P719E/PA 2021-823302				
Defendant Name		First KENN	IETH .			Middle 1	1		Last SIMON	
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Lead? Offense # YES 1	Section 911		Subsection B1		PA Stat	lute (Title)	Count 1	F1	NCIC Offense Code	UCR/NIBRS CC91
(lf applicable)	Number					Interstate in NO	dicator	Safety 2 NO	one	Work Zone NO
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Defend	ant Name		First KENN	ETH			Middle I			Last SIMON	
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			15.						
Dacket Number	Date Filed	OTN/Live Scan X400518-6	Number		nt/Incident 719E/PA 2	Number 021-823302			
Defendant Name	First KENNETH		Middle I			Last SIMON			
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Docket Number		Date Filed	OTN/Live Scar X400518-6	n Number		nt/incident 719E/PA	t Number 2021-823302		
Defendant Name		First KENNETH		Mlddie 1	Alddle Last SIMON				
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Docket Number	Date Filed	X400518-6	Number	Complaint/Incident 01018P719E/PA 20	
Defendant Name	Defendant's First Name KENNETH		Middle Name (4	Last Name SIMON

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn faisification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 6
- 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.

ant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority,

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6-16-2021	mother of Tel
(Date	(Signature of Afflant))
AND NOW, on this date,	Do / 16/3/ I certify that the complaint has been properly completed and verified.
An affidavit of probable cause must be a second or a second of the cause must be a second or a second	pe completed before a warrant can be issued.
72-1-31	
(Magisterial District Court Number)	(Issuing Authority)
9	Philips S
T.	Lange Majorine articles
	2-2-76 32-2-76



Docket Number	Date Filed	OTN/Live Scan Number X400518-6	Complaint/Incident N O1018P719E/PA 20	17 1997
Defendant Name	Firet 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, cocalne, 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, cocalne, fentanyl/heroln, marijuana (including THC infused "edible" products) and ecstasy pilis.

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

FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORDING TO THE TRUE AND CORDING THE T	ING TO THE LAW, DEPOSE AND SAY THAT THE RECT TO THE BEST OF MY KNOWLEDGE,
CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE INFIELD JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILIDOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION A	NG CONFIDENTIAL INFORMATION AND
9	(Signature of Afflant)
Sworn to me and subscribed before me this day of _	TUNE desi
My commission expires first Monday of January,	Magistera District Judge



Docket Number		TN/Live Scan Numbe X400518-6	 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 WODDS 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' Contyn 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 afflants 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 Klp Street Philadelphia, PA.
- 3. 3218 Tyson Avenue, Philadelphia PA 19149
- 4. 1422 North 52nd Street., Philadelphia PA 19131.
- 5. 1721 Conlyn Street, Philadephia PA 19141
- 3632 North 3rd Street, Philadelphia PA 19140
- 7. 101 West Sharpnack Street, Philadelphia PA 19119.
- 3. 2015 White Audi Q7 Bearing PA registration LMK2947 VIN(WA1LGAFE1FD006533)

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Manager of Affants



Docket Number	Date Filed	OTN/Live Scan X400518-6	Number Complaint/Incident N O1018P719E/PA 20			
Defendant Name	First KENNETH		Middle I			

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

- 9. 2020 Grey Honda Accord Bearing Penneylvania registration LHV-1250 VIN (1HGCV3F84LA004256)
- 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900) 10.
- 11. 2017 Black Nissan Maxima PA reg KXG-4889 VIN (1N4AA6AP5HC445219)
- 2021 Grev Toyota Tundra ZPY6195 VIN (5TFAY5F10MX007232) 12,
- 2017 Silver Ford Taurus PA registration LGP8637 VIN (WA1LGAFE1FD006533) 13.

The search warrants were presented to and approved by Philadelphia County Common Pleas Judge Honorable Anne Marle 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 Marcon Ford F-160 PA registration ZMK-4067 VIN(1FTRX16W33NA09123)

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 afflants 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.

redeller Mary

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:

- 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 Cocalne (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. B2 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
- 2948 Klp Street Philadelphia, PA. 2.
 - 1. Indicia of ownership LLAMAS
- 3. 3218 Tyson Avenue, Philadelphia PA 19149
 - 1. 29 packages of THC infused edible products





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
- 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 handing on a closet door.
- 3. In an additional purse hanging on the closet door a Black Smith & Wesson handgun was recovered with serial number
- 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 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. \$1,176.00 in United States Currency
- 6. One small clear plastic bag containing suspected cocains (approximately 0.5 grams) (field test positive)

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

- 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 cocalne 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
- 163 Grant Street, Pottstown, Montgomery County Pennsylvania 8.
 - 1. 188 Packets of THC Edibles
 - 2. 13 THC Infused soda bottles
 - 3. Numerous THC vape cartridges
 - 4. 20 grams of marljuana
 - 5. Numerous new/unused Ziploc and vacuum sealed bags
 - 6, \$37,290 of US Currency
 - 7. Four (4) cellular telephones
 - 8. Four (4) vehicles
- 2136 Mathers Way, Cheltenham Township, Montgomery County Pennsylvania. 9
 - 1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweatpants beiginging



Dockel Number	Date Filed		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 Diphenidine.

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

All selzed items were selzed and entered into evidence at the Pennsylvania State Police barracks – Troop K, Philadelphia. We certify that this filing compiles 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.



COMMONWEALTH OF PENNSYLVANIA COUNTY OF: PHILADELPHIA									POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.					
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Docket Number		Date Fi	leđ	OTN/Li	ive Scan	Number	O1018P	nvincide 714D/P/	nt Number \ 2021-823660	
Defendant Name		First LOLY	ΓΔ		-	Middle R			Last LEE	
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Inchoate Offense	Attempt		Solicitation			nspiracy 8 903	Number	of Victir	ns Age 60 or Older	
ead? Offense #	Section 780-113	Ì	Subsection A16			(elfiT) efu	Count 1	F	NCIC Offense Code	UCR/NIBRS CS13
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Docket	, out of the first				OTN/Liv	OTN/Live Scan Number			O1018P714D/PA 2021-823660				
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Inche	ate Offense	Attempt . 18 901 A		Solicitati 18 902 /			nspiracy 9 903	Number	of Victir	ns Age 60 or Older			
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Docket Number	Date Filed	OTN/Live Scan		Complaint/Incident N 01018P714D/PA 20	
Defendant Name	Defendant's First Nar LOLYTA	me	Middle Name R		Lest Name LEE

- 2. I ask that a warrant of arrest or a summons be Issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification

	is made subject to the penalties of	Section 4904 of the C	rimes Code (18	Pa.C.S.§4904) relating	to uns	sworn falsification to authorities.	
4.	This complaint consists of the prec	eding page(s) number	ed 1 through	3			
5.	I certify that this filing complies with Pennsylvania that require filing co						
	e acts committed by the accused, as the contrary to the Act(s) of the Assen			peace and dignity of the	he Con	nmonwealth of Pennsylvania and	
	fore a warrant of arrest can be is I attached.)	sued, an affidavit of	probable cause	must be completed,	sworn	to before the Issuing authority	1
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	ND NOW, on this date,	06/16/21			een pro	pperly completed and verified,	
An	affidavit of probable cause must be	completed before a w	arrant can be is	sued.			
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Docket Number	Date Filed	OTN/Live Scan	Number	Complaint/incident i 01018P714D/PA 2	
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 (6) 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, cocalne, 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 afflants identified several persons within LLAMAS' drug trafficking organization. As a result of intercepted cellular telephone communications and surveillance, your afflants 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 GISSON 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.	7
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.	
4.51	-

(Signature of Affiant)

Sworn to me and subscribed before me this	day of	7.
Date		Magisteriar District Julge
My commission expires first Monday of January,	. *	AMANA SO CONTINUES OF CONTINUES



Docket Number	Date Flied	OTN/Live Scan No	ımber	Complaint/Incident O1018P714D/PA 2		
Defendant Name	First LOLYTA	MI R	ddle		Lest 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 methamphetamine and

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. 3216 Tyson Avenus, Philadelphia PA 19149
- 4. 1422 North 52nd Street, Philadelphia PA 19131.
- 5, 1721 Conlyn Street, Philadephia 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)
- B. 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1250 VIN (1HGCVFF8
- 10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16586L028900)
- 11. 2017 Black Nissan Maxima PA reg KXG-4899 VIN (1N4AA6AP5HC445219)

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Docket Number	Date Flled	OTN/Live Scan	Number	Complaint/Incident O1018P714D/PA 2		•
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Defendant Name	LOLYTA		R		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 Zahld 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 Trefficking 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

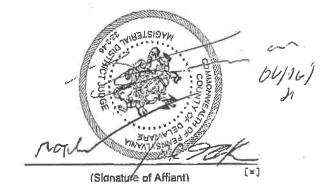
The search warrants were presented to and approved by Montgomery County Common Pleas Judge the Honorable Wendy Demchick-Alloy on June 15, 2021

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:

- 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. 6B 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
- 2948 Kip Street Philadelphia, PA. 2.
 - 1. Indicia of ownership LLAMAS
- 3216 Tyson Avenue, Philadelphia PA 19149 3.
 - 1, 29 packages of THC infused edible products





Docket Number	Date Filed	OTN/Live Scan Number	Complaint/In	cident Number	
			O1018P714	D/PA 2021-823680	
	First	Middle		Last	
Defendant Name	LOLYTA	R	,	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 Caliber bearing Serial Number: BPAE148
 - 5. Sliver/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 purpe handing 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).
- 3632 North 3rd Street, Philadelphia PA 19140
- 1. One Ruger .22 Caliber platol 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)

- 101 West Sharpnack Street, Philadelphia PA 19119.
- 1. Platol Sig P250- loaded with 1 chambered
- 2. Pistol Glack 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 paraphernalla
- 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) pellular 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 Henneth Simon.

(Signature of Affiant)

[*]



Docket Number	Date Filed	OTN/Live Scan Number	Complaint/Incide O1018P714D/P		(0)
Defendant Name	First	Middle		Last	
Deteriosit Isalia	LOLYTA	R		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 acstasy.

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 11b of suspected marijuana
- 6. Blazer .40 callber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All selzed items were seized and entered into evidence at the Pennsylvania State Police barracks – Troop K, Philadelphia. We certify that this filing compiles 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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COMMONWEA COUNTY OF:	COMMONWEALTH OF PENNSYLVANIA COUNTY OF: PHILADELPHIA Magislerial Dialrict Number: 32-2-48					*	×		POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.				
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Name of Attorney for C	ommo	wealth - Ple	ase Print or Typ	e) (Signa	ature of Alle	orney for C	ommonwe	ealth)				(Date)	
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as John Doe													_
with violating the per	nal law:	s of the Cor	nmonwealth o	f Pennsylva	anla at:	301							
					(Subdivisi	ion Code)			8T. PHILAD Subdivision)		ITY		
in <u>Philadelphia</u>		County	<u>51</u> (County C		about	6/16/202 (Offense	1 AT APPI Dale)	ROX. D	6:00 HRS				



Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1018P713D/PA 2021-823516	
Defendant Name	First LUIS	Middle P	Last	
The acts committed by the	accused are described b	elow with each Act of Assembly	or statute allegedly violated, if appropriate. When the	ere Is

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.

Incho	ate Offense	18 901 A	Solicitation 18 902 A		onspiracy 18 903	Numbe	r of Victin	ns Age 60 ar Older	
Lead? YES	Offense #	Section 7512	Subsection A	PA Sta	itute (Title)	Count 1	Grade F3	NCIC Offense Code	UCR/NIBRS CC75
Pen (if	ndol OAT/ applicable)	Accident Number			Interstate II	ndicator	Safety :	Zone	Work Zone
Statute C	escription (inc IAL USE OF	dude the name of statute COMMUNICATION F	or ordinance): ACILITY		•		10		

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.

io 2 780-113 A30 35 1 F CS13 Penn DOT DATA Accident Interstate Indicator Safety Zone Work Zone		ate Offense	18 901 A	Solicitation 15 902 A	44	onspiracy 18 903	Numbe	r of Victi	ms Age 60 or Older	
	Lead? NO	2	780-113			tute (Title)	Count 1	Grade	NCIC Offense Code	
				i.			ndicator		Zone	Work Zone NO

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 counterfait 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



Docket Number		Date Filed	OTN/LI	ve Scan	Number	Complai	nt/Incide	nt Number 2021-823516	
Defendant Name		First LUIS	1		Middle P.			Last	
The acts committed by more than one offense	the accused, each offense	are described be should be numb	low with each	h Act of oglically.	Assembly or	statute a	legedly v	violated, if appropriate	. When there is
Inchoate Offense	Attempt 18 901 A	189	etation 002 A		nspiracy 8 903	Number	of Victin	ns Age 60 or Older	
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Statute Description (Include CORRUPT ORG-INT/C	le the name of	statute or ordinance	3);						NO
Acts of the accused assor	ciated with this	Offense:							
IN THAT, on or about indirectly, any intere	t said date, ' st in or conf	THE DEFENDAN rol of any enter	IT did, throu prise.	igh a bi	attern of rac	keteerin	g activit	y to acquire or mai	ntain, directly or
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Dockel Number		Date Filed	OTN/L X4005	.i∨e Scan 512-0	Number	Complain O1018P	nt/Incider	nt Number 2021-823516	
Defendant Name		First LUIS			Middle P			Last LLAMAS	
The acts committed by more than one offense,	the accused, each offens	are described a should be nu	below with ea mbered chrono	ch Act of ologically.	Assembly or	statute a	llegedly v	violated, if appropriate	. When there is
Inchoate Offense	Attempt 18 901 A		olicitation 8 902 A		nspiracy 8 903	Number	of Victin	ns Age 60 or Older	
NO B 6	ection 111	Subse			ute (Title)	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC51
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counterfeit controlle	ed substanc	e lo (NAME A	ND DEPART	MENT O	F PERSON \	NHO PU	RCHASI		
Section 780-113(a)(3	30) of the P	A Controlled !	Substance, D	rug, Dev	ice and Cos	metic A	ct		
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Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Nu O1018P713D/PA 202	
Defendant Name	First LUIS	Middle P		est LAMAS

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.

incho	ate Offense	Attempt 18 901 A	Solicitation 18 902 A	S C	onspiracy 18 903	Numbe	r of Victi	ns Age 60 or Older	
Lead? NO	Offense #	Section 780-113	Subsection A16	PA Sta	itute (Title)	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
Per (If	inDOT DAT/ applicable)	Accident Number			Interstate II	ndicator	Safety NO	Zone	Work Zone NO
		clude the name of state					***************************************		
NT PO	SS CONTR	SUBST BY PER NO	IT 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, Davice and Cosmetic Act.

incho	ate Offense	Attempt . 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Numbe	r of Victi	ms Age 60 or Older	
NO	Offense #	Section 911	Subsection B4	PA Statute (Title)	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
Pen (If	nDOT DATA applicable)	Number		Interetate In	dicator	Safety NO	Zone	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.



Dacket Number	Date Filed	e Scan Number 2-0		cident Number D/PA 2021-823516	
Defendant Name	Defendant's First	Middle Nam P	10	Last Name LLAMAS	

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn faisification 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 filling confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused as listed and hereafter were applied the pages and distributed by

were contrary to the Act(s) of the Asse	mbly, or in violation of the	re statute cited.	Commonwealth of Pennsylvania and
(Before a warrant of arrest can be leand attached.)	ssued, an affidavit of I	probable cause must be completed, s	worn to before the leaving authority,
6-16-2021	_	Mah	1067
(Date	, V .	\. 	(Signature of Afflant))
AND NOW, on this date,	06/16/2.	I certify that the complaint has bee	en properly completed and verified.
An affidavit of probable cause must be	e completed before a w	arrant can be issued.	
34-71	W	A Comment of the Comm	
(Magisterial District Court Number)		(fasuing Authority)	
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Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident N O1018P713D/PA 20	354 1 1 1 3 3 4 1 1 3 5 5 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Defendant Name	First LUIS	Mlddie P	l i		

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 afflants 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

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CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE C THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILIN OCCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND	G CONFIDENTIAL INFORMATION AND
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	(Signature of Affiant)
Sworn to me and subscribed before me this	JUHE LOW
Date	.; Magisterial District Judge
My commission expires first Monday of January,	OS DELAWASTICATION OF PENNS IN THE PENNS IN



Docket Number	Date Filed	OTN/Live Scan Number X400512-0	Complaint/Incident Number O1018P713D/PA 2021-823516			
Defendant Name	First	Middle	Last			
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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, Manigomery County on May 15, 2021 to pay her \$10,000 for prior marijuana deliveries.

Hugo HYLAND, using cellular telephone (216) 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 self 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 afflants 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:

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Docket Number	Date Filed	OTN/Live Scan Numbe X400512-0	Complaint/Incident			
Defendant Name	First LUIS	Middle P	Α,	Last LLAMAS		

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

- 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, Philadephia PA 19141
- 6. 3632 North 3rd Street, Philadelphia PA 19140
- 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-1260 VIN (1HGCV3F94LA004266)
- 10. 2006 Silver Honda Civic PA registration LRL-7212 Vin (1HGFA16585L028900)
- 11. 2017 Black Nissan Mexima 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 Chellenham 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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Docket Number	Date Filed	OTN/Live Scan X400512-0	Number	Complaint/Incident 01018P713D/PA 2		
Defendent Norma	First		Middle		Last	
Defendant Name	LUIS		P		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, Montgomory 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 selzed:

- 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 desages of Heroin stamped "Venom" (field test positive)
 - 7. 68 individual doeages of Heroin stamped "Apple Jacks" (field test positive)
 - 6. 120 individual dosages of HeroIn stamped "Buffalo" (field test positive)
 - 9, 66 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 telephones
- 2. 2948 Klp Street Philadelphia, PA.
 - 1. Indicia of ownership LLAMAS
- 3218 Tyson Avenue, Philadelphia PA 19149
 - 1. 29 packages of THC infused edible products
- 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 handing 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 cocains (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
- 8. In addition to the above items, investigators seized several items to include various packaging, digital scales, celliliany phones, and IGBAL's Honda bearing Pennsylvania license plate LRL7212.

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

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Docket Number	Date Filed	OTN/Live Scan Nu X400512-0		Complaint/Incident O1018P713D/PA 2			
Defendant Name	First LUIS	Mic	idle		Lest 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 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 paraphernalla
- B. 153 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 newlunused 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 selzed Items were seized and entered into evidence at the Pennsylvania State Police barracks - Troop K, Philadelphia. We certify that this filling compiles 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 filling 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, 32-2-46 DEFENDANT: (NAME and ADDRESS) MDJ HON, STROHL, WALTER A **JAVIER VEGA** RICHARD Middle Name Last Name First Name Address: 27 S PENNELL RD 2868 FRANKFORD AVE LIMA, PA 19037 PHILADELPHIA, PA 19134 Telephone: (610) 585-4110 NCIC Extradition Code Type NCIC Extradition Code Type 1 - FELONY FULL DEFENDANT IDENTIFICATION INFORMATION AND THE RESERVE OF THE PROPERTY OF THE PR Scap Number Complaint/incident Number Request Lab Services O1018P722F/PA 2021-758588 POB Co-Defendant? Date of Birth Add'I DOB Gender 08/23/1983 GA - USA Defendant's First Name Middle Name Last Name Suffix Defendant Also Known As Ethnicity HISPANIC ORIGIN - H Race WHITE - W Eye Color Hair Color BLACK - BLK BROWN - BRO DNA DNA Location Weight NO 300 LBS FBI Number MNU Number Heighl 5' 0B" Defendant Fingerprinted Fingerprint Classification NO THE REPORT OF THE PROPERTY OF Registration Sticker (MM/YY) Commercial Vehicle? School Veh. Oth, NCIC Veh, Code Plate # State HazMat Reg. aame VIN Year Make Model Style Color as Def. NO Disapproved because: Approved Office of the Attorney of the Commanwealth (The altorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filling. Pa.R.Crim, P.507.) Name of Attorney for Commonwealth - Please Print or Type) (Signature of Attorney for Commonwealth) (Dale) IPR. LUKE MCILVAINE OF Thores Kasser 729268/13164 (Name of Afflant - Please Print or Type) (PSP/MPOETC - Assigned Afflant ID Number & Badge #) Pi) PA0231200 of PENNSYLVANIA STATE POLICE, TROOP O, EASTERN INT UNIT PAPSP1A00 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state; (check appropriate box) 1. It 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 [7] 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 STATITS INTERSECTION WITH N 10TH ST. PHILADELPHIA CITY (Subdivision Code) (Place-Political Subdivision)

in PHILADELPHIA

County

51

(County Code)

on or about

8/16/2021 AT APPROX. 16:15 HRS

(Offense Date)



	39.		W CORP	49	r	OLICE	CRIMINAL CO	JMPLAINI
Docket Number		Date Filad	OTN/Live Scar	Number	Complai O1018P	nt/Inciden	t Number 2021-758588	
Defendant Name		First RICHARD		Middle JAVIER			Last VEGA	
The acts committed more than one offens	by the accused se, each offens	are described below e should be numbered	with each Act of chronologically	Assembly or	r statute a	liegedly v	lolated, if appropriate	. When there is
(Set forth a brief sun	nmary of the fac lthout more, is r	cts sufficient to advise not sufficient. In a sun	the defendant of	of the nature	of the offe e specific	ense(s) ch section(s	narged. A citation to the and subsection(s) o	ie statule(s) f the statute(s) or
Inchoate Offense	Attempt	Solicitati		onspiracy	Number	of Victim	s Age 60 or Older	
Lead? Offense #	18 901 A	Subsection	PA Stat	18 903 tute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
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	clude the name o	f statute or ordinance):		NO		NO		NO
Acts of the accused as								
IN THAT, on or ab	out sald date,	THE DEFENDANT,	who was empl	oyed or ass	oclated v	vith an e	nterprise, did cond	uct or
participate, direct	iy or indirectly	, in the conduct of	such enterpris	e's affairs tì	hrough a	pattern	of racketeering acti	vity.
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Ada of the accused as								(0) . 541 1.
subsection.	out asid date,	THE DEFENDANT,	ala conspire to	97) eretoly (provisio	ns or pa	ragraphs (1), (2) or ((3) of this
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Docket Nu	nuper		Date F	iled	OTN/L	ive Scan	Number		nl/Incident 722F/PA 2	Number 021-768588	
Defendant	t Name		First RICH	ARD	Middle JAVIER				Last VEGA		
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Inchoate	e Offense	18 901 A	4	18 902 A			napiracy 8 903	Numbe	r of Victims	Age 60 or Older	
NO 3		Section 5111		Subsection A1		PA State	ute (Title)	Count 1	Grade N	CIC Offense Code	UCR/NIBRS CC61
MAX (If ap	oplicable).	Acciden Numbe	r) —				Interstate In	dicator	Salety Zo	ne	Work Zone NO
Statute Det	ealplion (interpretation PROC UN	Jude the name of LACT/INTENT	statute	or ordinance): ROMOTE							- a
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intent to	g stolen o promote	r illegally obt the carrying (ainea p on of th	property, repre ne uniswful ac	isented tivity.	d the pro	oceads of u	niawfui a	activity, T	HE DEFENDANT R	cted with the
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	Offense	Attempt 18 901 A		Solicitation 18 902 A		"·· 18	nspiracy 9 903	0		Age 60 or Older	
10 4		Section 780-113		Subsection A30		PA Statu 36	ite (Title)	Count 1	F	CIC Offense Code	UCR/NIBRS CS13
(If ap	plicable)						Interstate in	dicator	Safety Zor NO	18	Work Zone NO
ilatule Des MANUFAC	cripilon (inc CTURE, D	lude the name o ELIVERY, OR	f statute POSSE	or ordinance): ESSION WITH I	INTENI	TO MA	NUFACTUR	E OR DE	LIVER		
		sociated with this		•							
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OR RECE	EIVED), in	violation of S	ection	780-113(a)(30)) of the	e PA Co	ntrolled Su	bstance,	Drug, De	ice and Cosmetic	Act
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Docket Number		Date F	iled	OTN/Li	ve S	can Number	Complain O1018P	nt/Incider 722F/PA	1 Number 2021-768588	â .	
Defendant Name		First RICHA	RD			Middle JAVIER			Last VEGA		
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Inchoate Offense	Attempt 18 901 A		Solicitation 18 902 A			Conspiracy 18 903	Number of Victims Age 60 or Older				
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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: 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.											
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Inchoate Offense	Attempt 18 901 A		Solicitation 10 802 /		딧	Conspiracy 18 903	Number	of Victin	ns Age 60 or Older		
YES 6	Section 780-113		Subsection A16		PA 18	Statule (Title)	Count 1	M	NCIC Offense Code	UCR/NIBRS CS13	
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THE DEFENDANT, registered or licen	did conspire to not being reg sed by the ap was not obtai	with and gistered propria ned dir	other person I under the C Ite State Boa ectly from, o	ontroile rd, did i r pursu	ed S kno ant	iubstance, Drug wingly or intent to, a valid presc	, Device lonally p ription (and Co ossess order or	in THAT, on or about the smelle Act, nor a properties of a practition order of a practition	actitioner nterfeit	
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Docket Number		Date F	iled	OTN/LI	ve Scan I	Number	Complaint/Incident Number O1018P722F/PA 2021-758568			
Defendant Name		First RICH/	ARO .			Middle JAVIER			Last VEGA	
The acts committed to more than one offens	by the accused e, each offense	are de: ehould	scribed below the numbered	with eac chronol	ch Act of A logically.	Assembly or	statute a	llegedly	violated, if appropriate	. When there is
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Section 100-115(2)	(SU) OF THE FF	COIM	oned Sabata	iice, Di	ug, Devi	Le allu Cus	menc Al			M
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Dockel Number	Date Filed	Date Filed OTN/Live Scal			nt/Incident Number 722F/PA 2021-758588		
Defendant Name Defendant's First Name		l Name	lams Middle Nami JAVIER		Last Name VEGA		
2. I ask that a warrant of an	rest or a summons be la	sued and that the d	elendant be	required to answer	r the charges I have made.		
 I verify that the facts set is made subject to the period 	forth in this complaint a enalties of Section 4904	re true and correct to of the Crimes Code	o the best of a (16 Pa.C.S.	my knowledge or §4904) relating to	information and bellef. This verification unsworn falsification to authorities.		
4. This complaint consists of	of the preceding page(s)	numbered 1 throug	h <u>6</u>				
					ne Unified Judicial System of ential information and documents.		
The acts committed by the ac were contrary to the Act(s) of				and dignity of the t	Commonwealth of Pennsylvenia and		
(Before a warrant of arrest and attached.)	can be issued, an affic	lavit of probable c	ause muet b	e completed, sw	orn to before the Issuing authority,		
6-16-202	-1		Δ	age!	1069TH		
(Date		r - 7	1		(Signature of Affiant))		
AND NOW, on this date,	0 W	16/21 Icen	tify that the c	omplaint has been	properly completed and verified.		
An affidavit of probable caus	e must be completed be			•			
321-	2)	6	2	-	7	,	
(Magisterial District Court N	umber)		(issuing A	uthority)	7		



Docket Number	Date Filed .	OTN/Live Scan Ni	ımber	Complaint/Incident Number O1018P722F/PA 2021-758588		
Defendant Name	First RICHARD		ddle AVIER		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 (aw 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, cocalne, 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 afflants 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

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FACTS SET FORTH IN THE FOREGOING AFFIC INFORMATION AND BELIEF.	AVIT ARE TRUE AND CO	RRECT TO THE BEST OF M	Y KNOWLEDGE,
I CERTIFY THAT THIS FILING COMPLIES WITH	THE DROVICIONS OF TH	E CASE DECORDO DUDINO	4 00000 DOLLOV OF
THE UNIFIED JUDICIAL SYSTEM OF PENNSYLL DOCUMENTS DIFFERENTLY THAN NON-CONFI	VANIA THAT REQUIRE FI	LING CONFIDENTIAL INFOR	MATION AND
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		(Signatu	of Affiant)
Sworn to me and subscribed before me this	day of	JUNE	7.91
Date		, Magisterial Distriction	udge
My commission expires first Monday of January,	2778	O PERMS	Marie Erika District
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Docket Number	Date Filed	OTN/Live Scan			ent Number A 2021-758588	
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 cocalne. WOODS would also cook cocalne 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.

Zahld 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, Philadephia 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(WA1LGAFE1FD0065

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Dockel Number	Date Filed	OTN/Live Scan Number		Complaint/incident Number O1018P722F/PA 2021-758588		
Defendant Name	dant Name First RICHARD		Middle JAVIER		Lest 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)
- 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 16, 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 afflants 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:

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

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Docket Number	Date Filed	OTN/Live Scan Number		Complaint/Incident Number O1018P722F/PA 2021-758588		
Defendant Name	First RICHARD		Middle JAVIER		Lest 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: 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 handing 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).
- 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 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 cocains (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 bage
 - 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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Dockel Number	Date Filed	OTN/Live Scan Number	Complaint/Incident Number O1018P722F/PA 2021-759588	19
Defendant Name	First RICHARD	Middle JAVIE	Last	

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 eliver/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 11b of suspected marijuana
- 6. Blazer .40 caliber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All solzed items were selzed and entered into evidence at the Pennsylvania State Police barracks – Troop K, Philadelphia. We certify that this filling compiles 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.



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COUNTY O	F: P	OF PENI HILADEL	NSYLVANIA LPHIA	*			POLICE CRIMINAL COMPLA COMMONWEALTH OF PENNSYLV VS. (NAME and ADDRESS)				
Magisterial District I MDJ Hon. STROH	-	-Z-46		DEFE	DANT:						
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Hair Color BLACK - BLK					Eye C	OF HISPANI	CORIGIN	- N			
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PHILADELPHIA		County	51 on (County Code)		6/16/202	21 AT APPRO	X. 14:46 HR	S			



	26		ţi.	P	OLIC	E CRIMINAL C	OMPLAINT
Docket Number	Date Filed	OTN/Live Scan X400506-1	Number			nt Number 4 2021-823367	
Defendant Name	First TIFFANY		Middle TENILLE			Last SIMON	
The acts committed by the accused more than one offense, each offens	l are described below e should be numbered	with each Act of chronologically.	Assembly or	r slatute a	llegedly	violated, if appropriate	. When there is
(Set forth a brief summary of the far allegedly violated, without more, is ordinance(s) allegedly violated.	cts sufficient to advise not sufficient. In a sun	the defendant on the comment of the	f the nature must cite th	of the offe a specific	nee(s) c section(harged. A citation to the sharped and subsection(s) of the sharped and subsection (s) of the sharped and the s	ne statule(s) f the statute(s) or
Inchoate Offense Attempt 18 901 A	Solicitati 18 902		enspiracy 8 903	Number 0	of Victir	ns Age 60 or Older	
Lead? Offense # Section 911	Subsection B3	PA Stat	ute (Title)	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
RennDOTIDATA Acciden			Interstate in	ndicator	Safety NO	Zone	Work Zone NO
Statute Description (Include the name of CORRUPT ORGANIZATIONS - Ele							
Acts of the accused associated with this IN THAT, on or about said date,		who was omni	auad ar acc	onlated v	with an	natoverine did and	4)-4
participate, directly or indirectly	y, in the conduct of	such enterpris	e'a affairs t	hrough a	pattern	of racketeering act	uct or vity.
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Inchoate Offense Attempt	Solicitation 18 902 A		nspiracy 8 903	Number	of Victin	ns Age 60 or Older	
Lead? Offense # Section NO 2 7512	Subsection A		ule (Title)	Count	Grade F3	NCIC Offense Code	UCR/NIBRS CC75
Penn DOT DATA Acciden (If applicable) Number	ri .		Interstate in	dicator	Safety 2	one	Work Zone NO
Statute Description (include the name of statute or ordinance): CRIMINAL USE OF COMMUNICATION FACILITY							
Acle 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.							
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Docker	Number		Date F	lled	OTN/L X4005		Number	Complai O1018	int/incide	nt Number \ 2021-823367	
Defenda	int Name	6	First TIFFA	NY			Middle TENILLE	5250		Last SIMON	
The acts more tha	committed an one offens	se, each offens	i are de e shoul	d be numbered	chrono	logically.	Assembly or			violated, if appropriate	, When there is
	ale Offense	(C) Attempt 18 901 /	1	Solicitati 18 902 /		5-1	onspiracy 18 903		r of Victir	ns Age 60 or Older	
Lead?	Offense #	Section 911		Subsection B4		PA Stat	ule (Title)	Count 1	Grade F1	NCIC Offense Code	UCR/NIBRS CC91
ASSET IF.	applicable)	Acciden Number	ř. A				Interstate In	dicator	Safety NO	Zone	Work Zone
		clude (he name d 181, 91182, 91		or ordinance);							
	T, on or ab	sociated with this out said date,			did cor	nspire to	violate the	provisio	ons of p	eragraphs (1), (2) or	(3) of this
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Inchoa	ate Offense	Attempt 18 901 A		Solicitation 16 902 A			nspiracy 8 903	Number	of Victin	ns Age 60 or Older	***
Lead?	Offense #	18 901 A Section 5111				1 1	enspiracy 8 903 ute (Tille)	Number Count	Grade	ns Age 60 or Older NCIC Offense Code	UCR/NIBRS
Lead? NO	Offense #	18 901 A Section 5111		16 902 A Subsection		PA Stat	8 903	Count 1	Grade F1 Safety 2	NCIC Offense Code	Work Zone
NO Pen	Offense # ADOT DATA Applicable) escription (inc	18 901 A Section 5111 Accident Number	statule	Subsection A1		PA Stat	8 903 ute (Tille) Interstate In	Count 1	Grade F1	NCIC Offense Code	CC51
Lead? NO Pen (If a Statute D DEAL IN	Offense # 4 ADDI DATA Applicable) escription (inc I PROC UNI e accused as	18 901 A Section 5111 Accident Number lude the name o	f statute TO PR	Subsection A1 or ordinance); OMOTE		PA Stat 18	8 903 ute (Tille) Interstate In	Count 1 dicator	Grade F1 Safety 2 NO	NCIC Offense Code	Work Zone NO
Pend (If a Statute D DEAL IN Acts of the IN THA including	Offense # 4 Applicable) escription (inc PROC UNI e accused as f, on or abo ng stolen or	18 901 A Section 5111 Accident Number lude the name o L ACT/INTENT sociated with this out said date,	f statute TO PR Offense THE D	or ordinance): OMOTE S: EFENDANT d roperty, representations	lid cond	PA Stat 18	8 903 ute (Tille) Interstate In	Count 1 dicator	Grade F1 Safety 2 NO	NCIC Offense Code	Work Zone NO
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Pend (If a Statute D DEAL IN Acts of the IN THA including	Offense # 4 Applicable) escription (inc PROC UNI e accused as f, on or abo ng stolen or	18 901 A Section 5111 Accident Number lude the name o L ACT/INTENT sociated with this out said date, r lilegally obta	f statute TO PR Offense THE D	or ordinance): OMOTE S: EFENDANT d roperty, representations	lid cond	PA Stat 18	8 903 ute (Tille) Interstate In	Count 1 dicator	Grade F1 Safety 2 NO	NCIC Offense Code	Work Zone NO
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Pend (If a Statute D DEAL IN Acts of the IN THA including	Offense # 4 Applicable) escription (inc PROC UNI e accused as f, on or abo ng stolen or	18 901 A Section 5111 Accident Number lude the name o L ACT/INTENT sociated with this out said date, r lilegally obta	f statute TO PR Offense THE D	or ordinance): OMOTE S: EFENDANT d roperty, representations	lid cond	PA Stat 18	8 903 ute (Tille) Interstate In	Count 1 dicator	Grade F1 Safety 2 NO	NCIC Offense Code	Work Zone NO
Pend (If a Statute D DEAL IN Acts of the IN THA including	Offense # 4 Applicable) escription (inc PROC UNI e accused as f, on or abo ng stolen or	18 901 A Section 5111 Accident Number lude the name o L ACT/INTENT sociated with this out said date, r lilegally obta	f statute TO PR Offense THE D	or ordinance): OMOTE S: EFENDANT d roperty, representations	lid cond	PA Stat 18	8 903 ute (Tille) Interstate In	Count 1 dicator	Grade F1 Safety 2 NO	NCIC Offense Code	Work Zone NO
Pend (If a Statute D DEAL IN Acts of the IN THA including	Offense # 4 Applicable) escription (inc PROC UNI e accused as f, on or abo ng stolen or	18 901 A Section 5111 Accident Number lude the name o L ACT/INTENT sociated with this out said date, r lilegally obta	f statute TO PR Offense THE D	or ordinance): OMOTE S: EFENDANT d roperty, representations	lid cond	PA Stat 18	8 903 ute (Tille) Interstate In	Count 1 dicator	Grade F1 Safety 2 NO	NCIC Offense Code	Work Zone NO
Pend (If a Statute D DEAL IN Acts of the IN THA including	Offense # 4 Applicable) escription (inc PROC UNI e accused as f, on or abo ng stolen or	18 901 A Section 5111 Accident Number lude the name o L ACT/INTENT sociated with this out said date, r lilegally obta	f statute TO PR Offense THE D	or ordinance): OMOTE S: EFENDANT d roperty, representations	lid cond	PA Stat 18	8 903 ute (Tille) Interstate In	Count 1 dicator	Grade F1 Safety 2 NO	NCIC Offense Code	Work Zone NO
Pend (If a Statute D DEAL IN Acts of the IN THA' includir	Offense # 4 Applicable) escription (inc PROC UNI e accused as f, on or abo ng stolen or	18 901 A Section 5111 Accident Number lude the name o L ACT/INTENT sociated with this out said date, r lilegally obta	f statute TO PR Offense THE D	or ordinance): OMOTE S: EFENDANT d roperty, representations	lid cond	PA Stat 18	8 903 ute (Tille) Interstate In	Count 1 dicator	Grade F1 Safety 2 NO	NCIC Offense Code	Work Zone NO



Docket Num	ber	-	Date F	iled			Number			nt Number	
Defendant N	Name		First	NA	X4005		Middle	OTUTBE	720EIPA	2021-823367 Last	
		ov the accused	TIFFA		with eac	h Act of	Assembly or	statule e	llegediy	SIMON violated, if appropriate	When there is
		e, each offens		d be numbered	chrono	logically.				65	. *************************************
Inchoate (Offense	Attempt 18 901 A	·	Solicitation 18 902 A			nspiracy 8 903	Numbe	r of Victin	ns Age 80 or Ölder	
NO 5	ense#	Section 780-113		Subsection A30		PA State 35	ute (Title)	Count 1	F	NCIC Offense Code	UCR/NIBRS CS13
(If app	licable)	Acciden Number	W.				Interstate in NO	dicator	Safety 2 NO	Zone	Work Zane NO
Statute Desci	riplion (inc	lude the name o			INTEN	T TO MA	NUFACTUR	E OR DE	LIVER		
Acts of the e	ccused as	sociated with this	Offens	e:							
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Inchoate (Offense	Attempt 18 901 A		Solicitation			nspiracy 8 903	Numbe	of Victin	ns Age 60 or Older	
Lead? Offe	ense#	Section 780-113		Subsection A16	`		ute (Title)	Count	Grade M	NCIC Offense Code	UCR/NIBRS C\$13
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Statule Descr	rip(ian (inc	lude the name o	f statute				110		INO		INO
Ade of the Bo	cused as		Offens	EFENDANT, I						Substance, Drug, De	
controlled	or coun	terfeit sub <mark>at</mark> a	nce, w	hich was not	obtain	ed direc	tly from, or	pursuar	it to, a v	owingly or intention alld prescription ord ce and Cosmetic Ac	er or order of a



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	16 901 A	Solicitation 18 902 A	Conspiracy 18 903	Numbe	r of Victi	ma Age 60 or Older	
Lead? Offense # NO 7	Section 780-113	Subsection A30	PA Statule (Title)	Count 1	Grade F	NCIC Offense Code	UCR/NIBRS CS13
PannDOT DAT/ ((f applicable)	Accident Number		Interstate in	dicator	Safety .	Zone	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 Offensa:

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

Inch	ate Offense	Attempt 18 901 A	Solicitation 18 902 A	112.1	пърігасу 18 903	Numbe	r of Victi	ms Age 60 or Older	
Lead? NO	Offense #	Section 780-113	Subsection A16	PA Stat	ute (Title)	Count 1	Grade M	NCIC Offense Code	UCR/NIBRS CS13
Pe (if	nDOT DATA applicable)	Number			Interstate I	ndicator	Safety NO	Zone	Work Zone NO
		clude the name of states				52.5	3 3 3		

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.



Docket Number	Date Filed	X400506-	Scan Number 1		ncident Number 0E/PA 2021-823367	
Defendant Name	Defendant's First I	Vame	Middle Nam TEN(LLE	18	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 faisification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 6
- 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, aworn to before the issuing authority, and attached.)

and attached.)	as branch and an annihiorar' amount to perote the lasting andionic
6-16-2021 (Date	Mail (Signature of Affiant))
AND NOW, on this date, An affidavit of probable cause must be completed before	l certify that the complaint has been properly completed and verified.
3 レーノー3 / (Magisterial District Court Number)	(lasuling Authority)
	Philip & Turm, or John 30 an



Docket Number	Date Flied	OTN/Live Scan X400506-1	Number'	Complaint/Incident	
Defendant Name	First TIFFANY	v	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 afflants, members of the Pennsylvania State Police, and the Delaware County Drug Task Force initiated a narcotics investigation into the Drug Trafficking Organization of Luie 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 afflants and other members of law enforcement have confirmed that Luis LLAMAS is distributing methamphetamine, cocaine, fentanyl/heroin, marijuane 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 216-341-4072 and 267-344-7027, was found to be distributing methamphetamine, cocaine, fentanyl/heroln, 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 Keyer 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.

(Signature of Affiant)

Sworn to me and subscribed before me this

Date

My commission expires first Monday of January,

My commission expires first Monday of January,



Docket Number	Date Flled	OTN/Live Scan Nu X400506-1	mber	Complaint/Incident I O1018P720E/PA 2	Mit 1750	
Defendant Name	First TIFFANY		ddle ENILLE		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 afflants 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, Philadephia 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(WA1LGAFE1#D00

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(Slonature of Affiant)



Docket Number	Date Filed	OTN/Live Scar X400506-1	Number	Complaint/Incident O1018P720E/PA 2		
Defendant Name	First TIFFANY		Middle TENILLE		Last SIMON	

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

- 2020 Grey Honda Accord Bearing Pennsylvania registration LHV-1260 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 2PY6195 VIN (5TFAY5F10MX007232)
- 2017 Silver Ford Taurus PA registration LGP8637 VIN (WA1LGAFE1FD006633)

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 Zahld 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 | GBAL 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.

- 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 Ed(b)es
 - 6. 334 individual dosages of Reroin stamped "Venom" (field test positive)
 - 7. 66 individual dosages of HeroIn stamped "Apple Jacks" (field test positive)

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

- 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

STAIL DISTRICT

Laf Affiant

06/16/2



Docket Number	Date Flied			Complaint/Incident Number		
		X400506-1		O1018P720E/PA Z	021-623367	
Defendant Name	First		Middle		Lest	
Detaildant Name	TIFFANY		TENILLE		SIMON	127

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

- 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 Callber bearing Serial Number: BPAE148
 - 5. Sliver/Black Taurus G2C 9MM Serial Number: TMU87326
 - 6, Black Taurus PT809 9MM Serial Number: TGR69871
- 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 handing 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).
- 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

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

- 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 cocains (field test positive)
- 6. Six (6) ounces of suspect crack cocalne (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 paraphernalla
- 163 Grant Street, Pottstown, Montgomery County Pennsylvania
 - 1, 18B 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
 - B. Four (4) vehicles
- 9

2136 Mathers Way, Cheltenham Township, Montgomery County Fermony and Township to Kenneth 1. U.S. currency in \$1.00 dollar bills totaling \$95. Located in grey sweatpants being indited Kenneth

(Signature of Affiant)

32.2.45



Docket Number	Date Filed	OTN/Live Scan Number X400506-1	Complaint/Incident Number O1018P720E/PA 2021-823367	
Defendant Name	First TIFFANY	Middle TENILLE	Last	93

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 callber Blazer FMJ ammunition was located on top of the hutch.

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

5. One (1) Black vecuum sealed bag containing approximately 11b 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 filling 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 filling confidential information and documents differently than non-confidential information and documents.

COST BALL DISTORT

(Signature of Affiant)

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Docket N	lumber		Date F	iled	OTN/LI X4005		n Number	Comple O1018	int/Incide P716E/P	ent Number A 2021-823642	#1
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Defend	ant Name		First ZAHID		Middle			Last IGBAL	
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Docket Number		Date F	iled	OTN/L X4005			lumber	Complain O1018P	716E/PA	nt Number 2021-823642	
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Defendant Name	First ZAHID			Middle			Lest IGBAL	77
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Docket Number		Date F	led	OTN/L X4005		Number	Compial O1018P	nt/incide 716E/P/	nt Number A 2021-823642	
Defendant Name		First ZAHID				Middle		-	Last IGBAL	
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Docket Number	Date Fled	X400524	e Scan Number 1-8		ncident Number 3E/PA 2021-823642	
Defendant Name	Defendant's Firs	l Name	Middle Nan	ie	Last Name IGBAL	

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to enswer 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 felsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through Z
- 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, and attached.)	an affidavit of probable cause must be completed, sworn to before the issuing authority,
6-16-2021	right on the
(Date	(Signapure of Affiant))
AND NOW, on this date,	I certify that the complaint has been properly completed and verified.
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(Magisterial District Court Number)	(Issuing Authority)
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Docket Number	Date Filed	OTN/Live Scan Number X400524-5	Complaint/Incident O1018F716E/PA 2		
Defendent Name	First ZAHID	Middle		Last IGBAL	

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 narcotice investigation into the Drug Trafficking Organization of Luls 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 cunces 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 Luls 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 afflants 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 OL KOLLE BEING DULY FACTS SET FORTH IN THE FOREGOING AFFIDAVIT AR INFORMATION AND BELIEF.	SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE RE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE,
I CERTIFY THAT THIS FILING COMPLIES WITH THE PRI THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA T DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL	OVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF HAT REQUIRE FILING CONFIDENTIAL INFORMATION AND LINFORMATION AND DOCUMENTS.
· ·	(Signature of Afflant)
Sworn to me and subscribed before me this	16 day of TUNE _ 1-21
Date	, Magisterial Phatrict Judge
My commission expires first Monday of January, ଅଟି	SERIAL DONNOUS TO SERIAL DONNO



Docket Number	Date Filed	OTN/Live Scan Nu X400524-5		Complaint/Incident I	
Defendant Name	First ZAHID	Mic	ddle		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 afflants via a Court authorized search warrant, searched the vehicle and found that the parcel contained approximately 30 pounds of methamphetamine (field tested positive). Your afflants 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.

Zahld 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 Juna 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, Philadephia 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)



Docket Number	Date Filed	OTN/Live Scan X400524-5	Number	Complaint/Incident O1018P716E/PA 2		
Defendant Name	First		Middle		Last	
Defendant Name	ZAHID				IGBAL	

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, Loiyta LEE, Juwan WOODS, Hugo HYLAND, Kenneth SIMON, Tiffany Simon and Zahid IGBAL:

- 1. 97 South Keyetone 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 afflants 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 Lolyla 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 Cocalne (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. 58 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 desages of Heroin stamped "PS5" (field test positive)
 - 11. Approximately \$45,000 of US Currency
 - 12, Glock 19,9MM bearing Seriel 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)



Docket Number	Date Flied	OTN/Live Scan Number X400524-8		Complaint/Incident Number O1016P716E/PA 2021-823642	
Defendant Name	First ZAHID		Middle		Lasi 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 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 handing 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
- 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).
- 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 pleatic bag containing suspected cocaine (approximately 0,5 grams) (field test positive)

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

- 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 mariluana
 - 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 kocaled in grey sweatbants belonging to Kenneth Simon,

(Signature of Affiant)

[ax]



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

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 callber 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 callber FMJ ammunition was located on top of the kitchen cabinet above the microwave. (32 rounds)

All seized items were selzed 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.

