

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELK

Magisterial District Number: 59-3-02
MDJ: Hon. James L. Martin
Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

ADAM

ROSS

CURCI

First Name

Middle Name

Last Name

Gen

517 EAST KAUL AVENUE, APT. #2, ST. MARYS, PA 15857

ST SMITHFIELD

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: _____
☐ 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition
☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed		OTN/LiveScan Number		Complaint/Incident Number		Request Lab Services?	
						BN7007219T		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER		DOB 03/22/1988		POB Pennsylvania		Add'l DOB		Co-Defendant(s)	
<input checked="" type="checkbox"/> Male		First Name		Middle Name		Last Name		Gen.	
<input type="checkbox"/> Female		AKA							
RACE		<input checked="" type="checkbox"/> White		<input type="checkbox"/> Asian		<input type="checkbox"/> Black		<input type="checkbox"/> Native American	
ETHNICITY		<input type="checkbox"/> Hispanic		<input checked="" type="checkbox"/> Non-Hispanic		<input type="checkbox"/> Unknown			
Hair Color		<input type="checkbox"/> GRY (Gray)		<input type="checkbox"/> RED (Red/Aubn.)		<input type="checkbox"/> SDY (Sandy)		<input type="checkbox"/> BLU (Blue)	
		<input type="checkbox"/> BLK (Black)		<input type="checkbox"/> ONG (Orange)		<input type="checkbox"/> WHI (White)		<input type="checkbox"/> XXX (Unk./Bald)	
		<input type="checkbox"/> BLN (Blonde / Strawberry)						<input checked="" type="checkbox"/> BRO (Brown)	
Eye Color		<input type="checkbox"/> BLK (Black)		<input type="checkbox"/> BLU (Blue)		<input type="checkbox"/> BRO (Brown)		<input checked="" type="checkbox"/> GRN (Green)	
		<input type="checkbox"/> HAZ (Hazel)		<input type="checkbox"/> MAR (Maroon)		<input type="checkbox"/> PNK (Pink)		<input type="checkbox"/> MUL (Multicolored)	
DNA		<input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location				WEIGHT (lbs.)	
FBI Number		786356ND7		MNU Number				185	
Defendant Fingerprinted		<input type="checkbox"/> YES <input type="checkbox"/> NO						Ft. HEIGHT In.	
Fingerprint Classification:								6 10	

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat	Registration Sticker (MM/YY)	Comm'l Veh. Ind.	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
		<input type="checkbox"/>	/	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

(Name of the Affiant)

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

of Pennsylvania Office of Attorney General

PA0222400

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [] St. Marys
(Subdivision Code) (Place-Political Subdivision)

in ELK County

[24]

(County Code)

on or about NOVEMBER 7, 2019



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ADAM	Middle: ROSS	Last: CURCI

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	1	780-113	A35(ii)	of the	TITLE 35	1	UF	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A NON-CONTROLLED SUBSTANCE: 13(A)(35)(II)								
Acts of the accused associated with this Offense: On 11/07/2019 Adam Curci Delivered approximately 8 grams of a non-controlled substance to an undercover agent for \$400, in the City of Saint Marys, PA. Curci sold the substance to an undercover agent identifying it as Methamphetamine, a Schedule II Controlled Substance.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	1	UM	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED/COUNTERFEIT SUBSTANCE: 13(A)16								
Acts of the accused associated with this Offense: On 11/07/2019 Adam Curci Possessed approximately 8 grams of a non-controlled substance.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	3	780-113	32	of the	TITLE 35	1	UM	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32								
Acts of the accused associated with this Offense: On the 11/07/2019, Adam Curci did have the use of, or did possess with intent to use, drug paraphernalia, namely a cigarette pack and plastic baggie, for the purpose of compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, ingesting, inhaling, or otherwise introducing into the human body a controlled substance.								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ADAM	Middle: ROSS	Last: CURCI

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	903	A1	of the	TITLE 18	1	UF		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**

Acts of the accused associated with this Offense:

On 11/07/2019 Adam Curci, with intent of promoting or facilitating the crime of Delivery of a controlled or counterfeit substance, did conspire and agree with Ashley Bowley, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possessing with the intent to Deliver and/or Delivering of approximately 8 grams of a non-controlled substance to an undercover agent.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	6	3921		of the	TITLE 18	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **THEFT BY UNLAWFUL TAKING OR DISPOSITION: 3921**

Acts of the accused associated with this Offense:

On 11/07/2019 Adam Curci, directly or by virtue of his complicity, unlawfully took, or exercised unlawful control over movable property of another with the intent to deprive him thereof: TO WIT: Adam Curci did unlawfully take \$400 from an undercover agent.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	7	903	A1	of the	TITLE 18	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**

Acts of the accused associated with this Offense:

On 11/07/2019 Adam Curci, with intent of promoting or facilitating the crime of Theft by Unlawful Taking or Disposition, directly or by virtue of his complicity, did conspire and agree with Ashley Bowley, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did unlawfully took, or exercised unlawful control over movable property of another with the intent to deprive him thereof: TO WIT: Adam Curci did unlawfully take \$400 from an undercover agent.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ADAM	Middle: ROSS	Last: CURCI

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 3.
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 statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) _____ (Year) _____ (Signature of Affiant) _____

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ADAM	Middle: ROSS	Last: CURCI

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Adam Ross Curci and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

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

_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF:ELKMagisterial District Number: 59-3-02
MDJ: Hon. James L. Martin
Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

ANDREW

THOMAS

HOOVER

First Name

Middle Name

Last Name

Gen

CURRENTLY ERIE COUNTY CORRECTIONS CENTER - 137 W. 2ND
STREET, ERIE, PA 16507

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed / /		OTN/LiveScan Number		Complaint/Incident Number BN7200085TH		Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		DOB 11/20/1984		POB Pennsylvania		Add'l DOB / /		Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name		Gen.			
AKA									
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown		<input type="checkbox"/> Asian <input type="checkbox"/> Non-Hispanic							
ETHNICITY <input type="checkbox"/> GRY (Gray) <input checked="" type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)									
Hair Color <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)									
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location				WEIGHT (lbs.)			
FBI Number		387696AC8		MNU Number		175			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO						Ft. HEIGHT In.			
Fingerprint Classification:						6		0	
DEFENDANT VEHICLE INFORMATION									
Plate #		State		Haz mat <input type="checkbox"/>		Registration Sticker (MM/YY) /		Comm'l Veh. Ind. <input type="checkbox"/>	
VIN		Year		Make		Model		Style	
								Color	
								Reg. same as Def. <input type="checkbox"/>	

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

/ /
(Date)

I, AGENT RANDALL T. SCHIRRA SR.

(Name of the Affiant)

282

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

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above☐ I accuse the defendant whose name is unknown to me but who is described as _____☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have
therefore designated as John Doe or Jane Doewith violating the penal laws of the Commonwealth of Pennsylvania at [] City Of Erie & Ridgway Twp.
(Subdivision Code) (Place-Political Subdivision)

in ELK County

[25 & 24]

(County Code)

on or about 11/01/2019 & 07/16/2020



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: ANDREW	Middle: THOMAS	Last: HOOVER

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	2	UF		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION WITH THE INTENT TO DELIVER A CONTROLLED SUBSTANCE: 13(A)30**

Acts of the accused associated with this Offense: On July 16, 2020 Andrew Thomas Hoover, directly or by virtue of his complicity, not being registered to do so, nor a practitioner registered or licensed by the appropriate state board, did possess with the intent to deliver the below listed controlled substances:

COUNT 1: Possessed with the intent to deliver 73 glassine stamped bags containing 3.90 grams of a mixture of heroin, a schedule I, fentanyl, a schedule II, and tramadol, a schedule IV controlled substances.

COUNT 2: Possessed with the intent to deliver 2.72 grams of a mixture of heroin, schedule I, and fentanyl, a schedule II, controlled substances.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	7	UM		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16**

Acts of the accused associated with this Offense: see attached Page 4 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	780-113	32	of the	TITLE 35	2	UM		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32**

Acts of the accused associated with this Offense: On July 16, 2020, Andrew Thomas Hoover did have the use of, or did possess with intent to use, drug paraphernalia, as listed below, for the purpose of compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, ingesting, inhaling, or otherwise introducing into the human body a controlled substance.

COUNT 1: pipes, spoons and needles

COUNT 2: boxes of empty, unstamped glassine bags, rubber bands, balloons, and a "cutting agent"



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: ANDREW	Middle: THOMAS	Last: HOOVER

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	903	A1	of the	TITLE 18	2	UF		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**

Acts of the accused associated with this Offense: see attached Page 4 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	5111	A	of the	TITLE 18		F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES: 5111**

Acts of the accused associated with this Offense: Andrew thomas Hoover, directly or by virtue of his complicity, from November 1, 2019 through July 16, 2020, did conduct financial transactions, with knowledge that the property involved represented the proceeds of unlawful activity, did act with the intent to promote the carrying on of the unlawful activity, TO WIT: Andrew Thomas Hoover used proceeds from the illegal distribution of Heroin to finance an illegal Methamphetamine and Heroin organization, in violation of Title 18 Pa.C.S. § 5111(a)(1).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: ANDREW	Middle: THOMAS	Last: HOOVER

OFFENSE DESCRIPTION CONTINUATION

**OFFENSE #2: VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64
OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16
(7 counts)**

On July 16, 2020 Andrew Thomas Hoover, directly or by virtue of his complicity, not being registered to do so, nor a practitioner registered or licensed by the appropriate state board, did possess the below listed controlled substances:

- COUNT 1:** Possessed 73 glassine stamped bags containing 3.90 grams of a mixture of heroin, a schedule I, fentanyl, a schedule II, and tramadol, a schedule IV controlled substances.
- COUNT 2:** Possessed 2.72 grams of a mixture of heroin, schedule I, and fentanyl, a schedule II, controlled substances.
- COUNT 3:** Possessed 0.22 grams of methamphetamine, a schedule II controlled substance.
- COUNT 4:** Possessed 9.01 grams of marijuana, a schedule I controlled substance.
- COUNT 5:** Possessed 5 clonazepam pills, a schedule IV controlled substance.
- COUNT 6:** Possessed 1 methylphenidate pill, a schedule III controlled substance.
- COUNT 7:** Possessed several pills and film strips containing buprenorphine, a schedule III controlled substance.

**OFFENSE #4: CRIMINAL CONSPIRACY 903(A)1
(2 counts)**

- COUNT 1:** On 11/01/2019 Andrew Hoover, with intent of promoting or facilitating the crime of Delivery of a controlled substance, did conspire and agree with Margaret Ann Wisor, James McDonald and, Joseph Amos Krise that they or one or more of them would engage in conduct which constitutes such crime or attempt or solicitation to commit such crime, and agreed to aid such other person(s) in the planning or commission of such crime or of an attempt or solicitation to commit such crime, TO WIT: Andrew Hoover, Joseph Krise, Margaret Wisor and James McDonald all put their money together, along with money from an undercover agent, for the purpose of purchasing and redistributing Methamphetamine, a Schedule II Controlled Substance.
- COUNT 2:** On 07/16/2020 Andrew Hoover, with intent of promoting or facilitating the crime of Possession With Intent to Delivery of a controlled substance, did conspire and agree with Cayla Royer that they or one or more of them would engage in conduct which constitutes such crime or attempt or solicitation to commit such crime, and agreed to aid such other person(s) in the planning or commission of such crime or of an attempt or solicitation to commit such crime, TO WIT: Andrew Hoover and Cayla Royer, did possess with the intent to deliver 73 glassine stamped bags containing 3.90 grams of a mixture of heroin, a schedule I, fentanyl, a schedule II, and tramadol, a schedule IV controlled substances, 2.72 grams of a mixture of heroin, schedule I, and fentanyl, a schedule II, controlled substances, 0.22 grams of methamphetamine, a schedule II controlled substance, 9.01 grams of marijuana, a schedule I controlled substance, 5 clonazepam pills, a schedule IV controlled substance, 1 methylphenidate pill, a schedule III controlled substance, and several pills and film strips containing buprenorphine, a schedule III controlled substance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: ANDREW	Middle: THOMAS	Last: HOOVER

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 4.
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 statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) _____ (Year) _____ (Signature of Affiant) _____

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: ANDREW	Middle: THOMAS	Last: HOOVER

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Andrew Thomas Hoover and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

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

_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELKMagisterial District Number: 59-3-02
MDJ: Hon. James L. Martin
Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

ASHLEY

ELIZABETH

BOWLEY

First Name

Middle Name

Last Name

Gen

515 ROCK STREET, RIDGWAY, PA 15853

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed / /		OTN/LiveScan Number		Complaint/Incident Number BN7007219T		Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female		DOB 03/03/1994		POB New Hampshire		Add'l DOB / /		Co-Defendant(s) <input type="checkbox"/>	
		First Name AKA ASHLEY		Middle Name		Last Name JACKSON		Gen.	
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Unknown									
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic									
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown)									
<input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink)									
<input type="checkbox"/> BLN (Blonde / Strawberry)									
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray)									
<input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)									
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location				WEIGHT (lbs.)			
FBI Number 955761RD2		MNU Number				117			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO						Ft. HEIGHT In.			
Fingerprint Classification:						5 4			

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

/ /
(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

(Name of the Affiant)

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

of Pennsylvania Office of Attorney General

PA0222400

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above☐ I accuse the defendant whose name is unknown to me but who is described as _____☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doewith violating the penal laws of the Commonwealth of Pennsylvania at [] Johnsonburg/Jay Twp./St.Marys
(Subdivision Code) (Place-Political Subdivision)

in ELK County

[24]

(County Code)

on or about 9/25/19, 10/22/19, 11/07/19



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ASHLEY	Middle: ELIZABETH	Last: BOWLEY

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	2	UF		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED AND/OR COUNTERFEIT SUBSTANCE: 13(A)30									
Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	2	780-113	A35(ii)	of the	TITLE 35	1	UF		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A NON-CONTROLLED SUBSTANCE: 13(A)(35)(II)									
Acts of the accused associated with this Offense: On 11/07/2019 Ashley Bowley Delivered approximately 8 grams of a non-controlled substance to an undercover agent for \$400, in the City of Saint Marys, PA. Bowley sold the substance to an undercover agent identifying it as Methamphetamine, a Schedule II Controlled Substance.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	3	780-113	A16	of the	TITLE 35	3	UM		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16									
Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ASHLEY	Middle: ELIZABETH	Last: BOWLEY

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	780-113	A32	of the	TITLE 35	3	UM		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32**

Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	903	A1	of the	TITLE 18	2	UF		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**

Acts of the accused associated with this Offense: see attached Page 6 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	6	7512	A	of the	TITLE 18	3	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF A COMMUNICATION FACILITY: 7512A.**

Acts of the accused associated with this Offense: see attached Page 6 "Offense Continuation Page"



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number BN7007219T
Defendant Name:	First: ASHLEY	Middle: ELIZABETH	Last: BOWLEY	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	7	3921		of the	TITLE 18	1			
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): THEFT BY UNLAWFUL TAKING OR DISPOSITION: 3921									
Acts of the accused associated with this Offense: On 11/07/2019 Ashley Elizabeth Bowley, unlawfully took, or exercised unlawful control over movable property of another with the intent to deprive him thereof: TO WIT: Ashely Bowley did unlawfully take \$400 from an undercover agent.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	8	903	A1	of the	TITLE 18	1	M1		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY 903(A)1									
Acts of the accused associated with this Offense: On 11/07/2019 Ashley Elizabeth Bowley, with intent of promoting or facilitating the crime of Theft by Unlawful Taking or Disposition, did conspire and agree with Adam Curci, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did unlawfully took, or exercised unlawful control over movable property of another with the intent to deprive him thereof: TO WIT: Ashley Elizabeth Bowley did unlawfully take \$400 from an undercover agent.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>				of the					
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance):									
Acts of the accused associated with this Offense:									



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ASHLEY	Middle: ELIZABETH	Last: BOWLEY

OFFENSE DESCRIPTION CONTINUATION

OFFENSE #1:

DELIVERY AND/OR POSSESSION WITH THE INTENT TO DELIVER A CONTROLLED OR COUNTERFEIT

SUBSTANCE: 13(A)30

(2 counts)

Ashley Elizabeth Bowley, a person not being authorized by law to deliver and/or possess with the intent to deliver a controlled and/or counterfeit substance, did on the below listed dates and locations, deliver and/or possessed with the intent to deliver Methamphetamine, a Schedule II Controlled Substance, and/or a counterfeit substance, in violation of Section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).

1. On 09/05/2019 Delivered 7.33 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent for \$400, in the Boro of Johnsonburg, PA.
2. On 10/22/2019 Delivered 4.64 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent for \$480, in Jay Township, PA.

OFFENSE #3:

POSSESSION OF A CONTROLLED OR COUNTERFEIT SUBSTANCE: 13(A)16

(3 counts)

Ashley Elizabeth Bowley, did knowingly or intentionally unlawfully possess a controlled and/or counterfeit substance, that is, on the below listed dates and locations, a person not being authorized by law to possess a controlled and/or counterfeit substance set forth herein, did knowingly or intentionally unlawfully possess Methamphetamine, a Schedule II Controlled Substance, and/or a counterfeit substance, in violation of Section 13(a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).

1. On 09/05/2019 Possessed 7.33 grams of Methamphetamine, a Schedule II Controlled Substance.
2. On 10/22/2019 Possessed 4.64 grams of Methamphetamine, a Schedule II Controlled Substance.
3. On 11/07/2019 Possessed approximately 8 grams of a counterfeit substance.

OFFENSE #4:

THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32

(3 counts)

On the below listed dates, Ashley Elizabeth Bowley did have the use of, or did possess with intent to use, drug paraphernalia, as listed below, for the purpose of compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, ingesting, inhaling, or otherwise introducing into the human body a controlled substance.

1. 09/05/2019 plastic baggie
2. 10/22/2019 plastic baggie
3. 11/07/2019 cigarette pack and plastic baggie



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ASHLEY	Middle: ELIZABETH	Last: BOWLEY

OFFENSE #5: CRIMINAL CONSPIRACY 903(A)1 (2-counts)

1. On 09/05/2019 Ashley Elizabeth Bowley, with intent of promoting or facilitating the crime of Possession with the Intent to Deliver and/or Delivery of a controlled substance, did conspire and agree with Margaret Ann Wisor and Dustin Andrew Black, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Delivering 7.33 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent.
2. On 11/07/2019 Ashley Elizabeth Bowley, with intent of promoting or facilitating the crime of Possession with the Intent to Deliver and/or Delivery of a non-controlled substance, did conspire and agree with Adam Ross Curci, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Delivering approximately 8 grams of a non-controlled substance to an undercover agent.

OFFENSE #6: CRIMINAL USE OF A COMMUNICATION FACILITY: 7512(A) (3 counts)

Ashley Elizabeth Bowley, did knowingly, intentionally, and unlawfully use a communication facility to commit, cause or facilitate the commission or the attempt thereof of the crime of Possession With Intent to Deliver or Delivery of a controlled or counterfeit substance, which constitutes a felony under the Controlled Substance, Drug, Device and Cosmetic Act, in violation of 18 Pa. C.S.A. §7512. To-wit: On or about the below listed occurrences, Ashley Elizabeth Bowley did engage in telephone conversations and/or text communications, with the below listed person(s), to commit or attempt to commit the distribution of a controlled and/or non controlled substance, 35 P.S. §780-113(a)(30), throughout Elk County, Pennsylvania.

1. 09/05/2019 Ashley Elizabeth Bowley used a communication facility to communicate with Margaret Wisor to arrange to sell Methamphetamine to an undercover agent.
2. 10/22/2019 Ashley Elizabeth Bowley used a communication facility to communicate with an undercover agent to arrange to sell Methamphetamine to an undercover agent.
3. 11/07/2019 Ashley Elizabeth Bowley used a communication facility to communicate with an undercover agent to arrange to sell Methamphetamine to an undercover agent.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ASHLEY	Middle: ELIZABETH	Last: BOWLEY

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 hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Year)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: ASHLEY	Middle: ELIZABETH	Last: BOWLEY

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Ashley Elizabeth Bowley and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

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

_____, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELK

Magisterial District Number: 59-3-02
MDJ: Hon. James L. Martin
Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

CAYLA

ANN

ROYER

First Name

Middle Name

Last Name

Gen

45 Hidden Hills Road, Weedville, PA 15868

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: _____
☐ 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition
☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 10/27/1982 First Name	POB Pennsylvania Middle Name	Add'l DOB / / Last Name	Co-Defendant(s) <input type="checkbox"/> Gen.

RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

Hair Color ☐ GRY (Gray) ☐ RED (Red/Aubn.) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☒ BRO (Brown)

☐ BLK (Black) ☐ ONG (Orange) ☐ WHI (White) ☐ XXX (Unk./Bald) ☐ GRN (Green) ☐ PNK (Pink)

☐ BLN (Blonde / Strawberry)

Eye Color ☐ BLK (Black) ☐ BLU (Blue) ☒ BRO (Brown) ☐ GRN (Green) ☐ GRY (Gray)

☐ HAZ (Hazel) ☐ MAR (Maroon) ☐ PNK (Pink) ☐ MUL (Multicolored) ☐ XXX (Unknown)

DNA ☐ YES ☐ NO DNA Location WEIGHT (lbs.)

FBI Number 799023KC2 MNU Number 140

Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT In.

Fingerprint Classification: 5 6

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

(Name of the Affiant)

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

of Pennsylvania Office of Attorney General

PA0222400

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [] Ridgway Township
(Subdivision Code) (Place-Political Subdivision)

in ELK County

[24]

(County Code)

on or about JULY 16, 2020



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: CAYLA	Middle: ANN	Last: ROYER

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	2	UF		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED SUBSTANCE: 13(A)30**

Acts of the accused associated with this Offense: On July 16, 2020 Cayla Ann Royer Hoover, directly or by virtue of her complicity, not being registered to do so, nor a practitioner registered or licensed by the appropriate state board, did possess with the intent to deliver the below listed controlled substances:

COUNT 1: Possessed with the intent to deliver 73 glassine stamped bags containing 3.90 grams of a mixture of heroin, a schedule I, fentanyl, a schedule II, and tramadol, a schedule IV controlled substances.

COUNT 2: Possessed with the intent to deliver 2.72 grams of a mixture of heroin, schedule I, and fentanyl, a schedule II, controlled substances.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	7	UM		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16**

Acts of the accused associated with this Offense: see attached Page 4 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	3	780-113	32	of the	TITLE 35	2	UM		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32**

Acts of the accused associated with this Offense: On July 16, 2020, Cayla Ann Royer did directly or by virtue of her complicity, have the use of, or did possess with intent to use, drug paraphernalia, as listed below, for the purpose of compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, ingesting, inhaling, or otherwise introducing into the human body a controlled substance.

COUNT 1: pipes, spoons and needles

COUNT 2: boxes of empty, unstamped glassine bags, rubber bands, balloons, and a "cutting agent"



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: CAYLA	Middle: ANN	Last: ROYER

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	4	903	A1	of the	TITLE 18	1	UF		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY 903(A)1									
Acts of the accused associated with this Offense: see attached Page 4 "Offense Continuation Page"									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	5	5111	A	of the	TITLE 18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES: 5111									
Acts of the accused associated with this Offense: Cayla Ann Royer, directly or by virtue of her complicity, on July 16, 2020, did conduct financial transactions, with knowledge that the property involved represented the proceeds of unlawful activity, did act with the intent to promote the carrying on of the unlawful activity, TO WIT: Cayla Ann Royer used proceeds from the illegal distribution of Heroin to finance her illegal Heroin organization, in violation of Title 18 Pa.C.S. § 5111(a)(1).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance):									
Acts of the accused associated with this Offense:									



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: CAYLA	Middle: ANN	Last: ROYER

OFFENSE DESCRIPTION CONTINUATION

OFFENSE #2: VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16 (7 counts)

On July 16, 2020 Cayla Ann Royer, not being registered to do so, nor a practitioner registered or licensed by the appropriate state board, did directly or by virtue of her complicity, possess the below listed controlled substances:

- COUNT 1:** Possessed 73 glassine stamped bags containing 3.90 grams of a mixture of heroin, a schedule I, fentanyl, a schedule II, and tramadol, a schedule IV controlled substances.
- COUNT 2:** Possessed 2.72 grams of a mixture of heroin, schedule I, and fentanyl, a schedule II, controlled substances.
- COUNT 3:** Possessed 0.22 grams of methamphetamine, a schedule II controlled substance.
- COUNT 4:** Possessed 9.01 grams of marijuana, a schedule I controlled substance.
- COUNT 5:** Possessed 5 clonazepam pills, a schedule IV controlled substance.
- COUNT 6:** Possessed 1 methylphenidate pill, a schedule III controlled substance.
- COUNT 7:** Possessed several pills and film strips containing buprenorphine, a schedule III controlled substance controlled substance.

OFFENSE #4: CRIMINAL CONSPIRACY 903(A)1 (1 count)

- COUNT 1:** On 07/16/2020 Cayla Ann Royer, with intent of promoting or facilitating the crime of Possession With Intent to Delivery of a controlled substance, did conspire and agree with Andrew Hoover that they or one or more of them would engage in conduct which constitutes such crime or attempt or solicitation to commit such crime, and agreed to aid such other person(s) in the planning or commission of such crime or of an attempt or solicitation to commit such crime, TO WIT: Cayla Royer and Andrew Hoover, did possess with the intent to deliver 73 glassine stamped bags containing 3.90 grams of a mixture of heroin, a schedule I, fentanyl, a schedule II, and tramadol, a schedule IV controlled substances, 2.72 grams of a mixture of heroin, schedule I, and fentanyl, a schedule II, controlled substances, 0.22 grams of methamphetamine, a schedule II controlled substance, 9.01 grams of marijuana, a schedule I controlled substance, 5 clonazepam pills, a schedule IV controlled substance, 1 methylphenidate pill, a schedule III controlled substance, and several pills and film strips containing buprenorphine, a schedule III controlled substance controlled substance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: CAYLA	Middle: ANN	Last: ROYER

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 4.
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 statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) _____ (Year) _____ (Signature of Affiant) _____

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200085TH
Defendant Name:	First: CAYLA	Middle: ANN	Last: ROYER

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Cayla Ann Royer and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

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

_____, Magisterial District Judge

My commission expires first Monday of January,

SEAL

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELK

Magisterial District Number: 59-3-02

MDJ: Hon. James L. Martin

Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

DUSTIN

ANDREW

BLACK

First Name

Middle Name

Last Name

Gen

CURRENTLY ARMSTRONG COUNTY JAIL - 171 STALEYS COURTS
RD, KITTANNING, PA 16201

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed / /		OTN/LiveScan Number		Complaint/Incident Number BN7007219T		Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		DOB 09/22/1988		POB Pennsylvania		Add'l DOB / /		Co-Defendant(s) <input type="checkbox"/>	
		First Name		Middle Name		Last Name		Gen.	
		AKA							
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown									
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown									
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input checked="" type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)									
Eye Color <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)									
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location				WEIGHT (lbs.)			
FBI Number		903682VD7		MNU Number		225			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO						Ft. HEIGHT In.			
Fingerprint Classification:						5		11	

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

(Name of the Affiant)

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

of Pennsylvania Office of Attorney General

PA0222400

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above
☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [] (Subdivision Code) (Place-Political Subdivision)

in ELK County [] on or about _____
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number BN7007219T
Defendant Name:	First: DUSTIN	Middle: ANDREW	Last: BLACK	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	4	UF	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED SUBSTANCE: 13(A)30**

Acts of the accused associated with this Offense:

- 08/19/2019 Delivered 0.95 grams of Methamphetamine, a Schedule II Controlled Substance, to CI7-020-19 for \$100, in the Boro of Ridgway, PA.
- 08/27/2019 Delivered 3.33 grams of Methamphetamine, a Schedule II Controlled Substance, to CI7-020-19 for \$200, in the Boro of Johnsonburg, PA.
- 09/01/2019 Delivered 3.31 grams of Methamphetamine, a Schedule II Controlled Substance, to CI7-020-19 for \$150, in the City of Sainty Marys, PA.
- 09/05/2019 did, knowingly or by virtue of his complicity, Deliver 7.33 grams of Methamphetamine, a Schedule II Controlled Substance, to Ashley Bowley who inturn delivered it to an undercover agent for \$400, in the Boro of Johnsonburg, PA.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	4	UM	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16**

Acts of the accused associated with this Offense:

- 08/19/2019 Possessed 0.95 grams of Methamphetamine, a Schedule II Controlled Substance.
- 08/27/2019 Possessed 3.33 grams of Methamphetamine, a Schedule II Controlled Substance.
- 09/01/2019 Possessed 3.31 grams of Methamphetamine, a Schedule II Controlled Substance.
- 09/05/2019 did, knowingly or by virtue of his complicity, Possess 7.33 grams of Methamphetamine, a Schedule II Controlled Substance

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	3	780-113	32	of the	TITLE 35	4	UM	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32**

Acts of the accused associated with this Offense: On the below listed dates, Dustin Andrew Black, did have the use of, or did possess with intent to use, drug paraphernalia, as listed below, for the purpose of compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, ingesting, inhaling, or otherwise introducing into the human body a controlled substance.

- On 08/19/2019 ziplock baggie
- On 08/27/2019 ziplock baggie
- On 09/01/2019 cigarette pack
- On 09/05/2019 plastic baggie



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: DUSTIN	Middle: ANDREW	Last: BLACK

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	903	A1	of the	TITLE 18	1	UF		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**

Acts of the accused associated with this Offense: On 09/05/2019 Dustin Andrew Black, with intent of promoting or facilitating the crime of Possession with the Intent to Deliver a controlled substance, did conspire and agree with Ashley Bowley and Margaret Wisor, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Delivering 7.33 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent for \$400, in the Boro of Johnsonburg, PA.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense:

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: DUSTIN	Middle: ANDREW	Last: BLACK

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Dustin Andrew Black and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____
_____, Magisterial District Judge

My commission expires first Monday of January,

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: DUSTIN	Middle: ANDREW	Last: BLACK

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 3.
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 statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Year)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELK

Magisterial District Number: 59-3-02

MDJ: Hon. James L. Martin

Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

JAMES

MATTHEW

MCDONALD

First Name

Middle Name

Last Name

Gen

CURRENTLY ELK COUNTY PRISON

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed / /		OTN/LiveScan Number		Complaint/Incident Number BN7007219T		Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		DOB 06/06/1973		POB Pennsylvania		Add'l DOB / /		Co-Defendant(s) <input type="checkbox"/>	
		First Name		Middle Name		Last Name		Gen.	
AKA									
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown									
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown									
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)		<input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> ONG (Orange)		<input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> WHI (White)		<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)		<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)		<input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon)		<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)		<input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)		<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)	
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location				WEIGHT (lbs.)		160	
FBI Number		424096WA9		MNU Number				Ft. HEIGHT In.	
Defendant Fingerprinted		<input type="checkbox"/> YES <input type="checkbox"/> NO						5 9	
Fingerprint Classification:									
DEFENDANT VEHICLE INFORMATION									
Plate #		State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /		Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN		Year	Make	Model		Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, AGENT RANDALL T. SCHIRRA SR.

(Name of the Affiant)

282

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

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above
☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have
therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []
(Subdivision Code) (Place-Political Subdivision)

in ELK County [] on or about _____
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: JAMES	Middle: MATTHEW	Last: MCDONALD

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	1	903	A1	of the	TITLE 18	1	UF		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED SUBSTANCE: 13(A)30**

Acts of the accused associated with this Offense: On 11/01/2019 James McDonald, with intent of promoting or facilitating the crime of Delivery and/or Possession with the Intent to Deliver a controlled substance, did conspire and agree with Margaret Ann Wisor, Joseph Krise and Andrew Hoover, that they or one or more of them would engage in conduct which constitutes such crime or attempt or solicitation to commit such crime, and agreed to aid such other person(s) in the planning or commission of such crime or of an attempt or solicitation to commit such crime, TO WIT: James McDonald, Margaret Wisor, Joseph Krise and Andrew Hoover conspired to purchase and distribute Methamphetamine, a Schedule II Controlled Substance.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: JAMES	Middle: MATTHEW	Last: MCDONALD

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 2.
5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Year)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: JAMES	Middle: MATTHEW	Last: MCDONALD

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by James Matthew McDonald and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

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

_____, Magisterial District Judge

My commission expires first Monday of January,

SEAL

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELK

Magisterial District Number: 59-3-02

MDJ: Hon. James L. Martin

Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

JOSEPH

AMOS

KRISE

First Name

Middle Name

Last Name

Gen

562 BRANDY CAMP ROAD, KERSEY, PA 15846

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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GENDER	DOB 11/16/1970	POB Pennsylvania	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	Gen.
<input checked="" type="checkbox"/> Male	First Name	Middle Name	Last Name		
<input type="checkbox"/> Female	AKA				

RACE	<input checked="" type="checkbox"/> White	<input type="checkbox"/> Asian	<input type="checkbox"/> Black	<input type="checkbox"/> Native American	<input type="checkbox"/> Unknown
ETHNICITY	<input type="checkbox"/> Hispanic	<input checked="" type="checkbox"/> Non-Hispanic	<input type="checkbox"/> Unknown		

Hair Color	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)	<input checked="" type="checkbox"/> BRO (Brown)
	<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PNK (Pink)
	<input type="checkbox"/> BLN (Blonde / Strawberry)					

Eye Color	<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)
	<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> XXX (Unknown)

DNA	<input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.)
FBI Number		MNU Number	220

Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO	Ft. HEIGHT In.
Fingerprint Classification:		6 2

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

/ /
(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

(Name of the Affiant)

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

of Pennsylvania Office of Attorney General

PA0222400

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above☐ I accuse the defendant whose name is unknown to me but who is described as _____☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doewith violating the penal laws of the Commonwealth of Pennsylvania at []
(Subdivision Code) (Place-Political Subdivision)in ELK County [] on or about _____
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: JOSEPH	Middle: AMOS	Last: KRISE

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	1	903	A1	of the	TITLE 18	1	UF	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**

Acts of the accused associated with this Offense:

On 11/01/2019 Joseph Amos Krise, with intent of promoting or facilitating the crime of Delivery of a controlled substance, did conspire and agree with Margaret Ann Wisor, James McDonald and Andrew Hoover, that they or one or more of them would engage in conduct which constitutes such crime or attempt or solicitation to commit such crime, and agreed to aid such other person(s) in the planning or commission of such crime or of an attempt or solicitation to commit such crime, TO WIT: Joseph Krise, Margaret Wisor, James McDonald and Andrew Hoover conspired to purchase and distribute Methamphetamine, a Schedule II Controlled Substance.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>				of the				
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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

Acts of the accused associated with this Offense:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>				of the				
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: JOSEPH	Middle: AMOS	Last: KRISE

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 2.
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 statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) _____ (Year) _____ (Signature of Affiant) _____

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: JOSEPH	Middle: AMOS	Last: KRISE

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Joseph Amos Krise and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

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

_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,

SEAL



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF:ELKMagisterial District Number: 59-3-02
MDJ: Hon. James L. Martin
Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

JOSHUA

LEE

PULLIAM

First Name

Middle Name

Last Name

SCI ALBION, INMATE #QE3315

Ge
n

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed / /	OTN/LiveScan Number		Complaint/Incident Number BN7200072M	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 12/31/1984	POB PENNSYLVANIA			Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name		Middle Name		Last Name		Gen.
AKA						
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown						
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown						
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)						
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)						
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location				WEIGHT (lbs.)
FBI Number		860281CC1		MNU Number		280
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO						Ft. HEIGHT In.
Fingerprint Classification:						6 1
DEFENDANT VEHICLE INFORMATION						
Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN	Year	Make	Model	Style	Color	Reg. same as Def. <input type="checkbox"/>

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

/ /
(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

(Name of the Affiant)

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

of Pennsylvania Office of Attorney General

PA0222400

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above☐ I accuse the defendant whose name is unknown to me but who is described as _____☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in ELK County

[]

on or about

(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: LEE	Last: PULLIAM	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	1	UF	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED SUBSTANCE: 13(A)30								
Acts of the accused associated with this Offense: Joshua Lee Pulliam, directly or by virtue of his complicity, a person not being authorized by law to deliver and/or possessed with the intent to deliver Methamphetamine, on or between April 2019 through September 9, 2020, did deliver and/or possessed with the intent to deliver Methamphetamine, a Schedule II Controlled Substance, throughout Clearfield, Elk and Erie Counties, Pennsylvania, in violation of Section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	1	UM	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16								
Acts of the accused associated with this Offense: Joshua Lee Pulliam, directly or by virtue of his complicity, a person not being authorized by law to possess a controlled substance, did knowingly or intentionally unlawfully possess a controlled substance, that is, on or between April 2019 through September 9, 2020, throughout Clearfield, Elk and Erie Counties, Pennsylvania, did knowingly or intentionally unlawfully possess Methamphetamine, a Schedule II Controlled Substance, in violation of Section 13(a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	3	903	A1	of the	TITLE 18	2	UF	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY 903(A)1								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: LEE	Last: PULLIAM

Acts of the accused associated with this Offense: see attached Page 4 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	7512	A	of the	TITLE 18	4	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF A COMMUNICATION FACILITY: 7512-A.**

Acts of the accused associated with this Offense: see attached Page 4 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
-------------------------	--	---	---	---

<input type="checkbox"/>	5	911	B(3)(4)	of the	TITLE 18	2	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS: 911(B)(3)(4)**

Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	6	5111	A1	of the	TITLE 18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES: 5111(A)(1)**

Acts of the accused associated with this Offense: Joshua Lee Pulliam, did directly or by virtue of his complicity, conduct financial transactions with the knowledge that the property involved including stolen or illegally obtained property, represents the proceeds of unlawful activity, the person acts with the intent to promote the carrying on of the unlawful activity, to-wit: On or about April 2019 through September 9, 2020, Joshua Lee Pulliam obtained and/or utilized proceeds from the illegal distribution of Methamphetamine to finance an illegal Methamphetamine distribution organization in violation of Title 18 Pa.C.S. § 5111(a)(1).



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: LEE	Last: PULLIAM

OFFENSE DESCRIPTION CONTINUATION

OFFENSE #3: CRIMINAL CONSPIRACY 903(A)1 (2 counts)

1. On or between April 2019 through September 9, 2020, Joshua Lee Pulliam, directly or by virtue of his complicity, with intent of promoting or facilitating the crime of Delivery and/or Possession With the Intent to Deliver, a controlled substance, did conspire and agree with Thomas Wallace, Margaret Wisor, Joshua Oscar Coles and Russell Bloom, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Delivering and/or Possessed With the Intent to Deliver, Methamphetamine, a Schedule II Controlled Substance, throughout Clearfield, Elk and Erie Counties, Pennsylvania, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).
2. On or between April 2019 through September 9, 2020, Joshua Lee Pulliam, directly or by virtue of his complicity did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or an attempt or solicitation to commit a crime, that is, on or between April 2019 through September 9, 2020, in Clearfield, Elk and Erie Counties, Pennsylvania, Joshua Lee Pulliam did conspire and agree with Thomas Edwin Wallace, Margaret Ann Wisor, Joshua Oscar Coles, Russell Bloom and others known and unknown, that they or one or more of them would engage in conduct constituting the crime of Dealing in Proceeds of Unlawful Activities, to include utilizing proceeds from the illegal distribution of Methamphetamine to finance an illegal Methamphetamine distribution organization in violation of Title 18 Pa.C.S. § 5111(a)(1), all of which is in violation of Title 18 Pa.C.S.A. § 903.

OFFENSE #4: CRIMINAL USE OF A COMMUNICATION FACILITY: 7512(A) (4 counts)

Joshua Lee Pulliam, did knowingly, intentionally, and unlawfully use a communication facility to commit, cause or facilitate the commission or the attempt thereof of the crime of Possession With Intent to Deliver or Delivery of Methamphetamine, which constitutes a felony under the Controlled Substance, Drug, Device and Cosmetic Act, in violation of 18 Pa. C.S.A. §7512. To-wit: On or about the below listed occurrences, Joshua Lee Pulliam did engage in telephone conversations and/or text communications to commit or attempt to commit the distribution of Methamphetamine, 35 P.S. §780-113(a)(30).

1. On or between April 2019 through September 9, 2020, Joshua Lee Pulliam used a communication facility to communicate with Thomas Wallace to direct Thomas Wallace to where he could obtain Methamphetamine for the purpose of distributing the Metamphetamine throughout Clearfield, Elk and Erie Counties, Pennsylvania.
2. On or between April 2019 through September 9, 2020, Joshua Lee Pulliam used a communication facility to communicate with Margaret Ann Wisor to direct Margaret Ann Wisor to where she could obtain Methamphetamine for the purpose of distributing the Metamphetamine throughout Elk County, Pennsylvania.
3. On or between April 2019 through September 9, 2020, Joshua Lee Pulliam used a communication facility to communicate with Joshua Oscar Coles to direct Joshua Oscar Coles to where he could obtain Methamphetamine for the purpose of distributing the Metamphetamine throughout Erie County, Pennsylvania.
4. On or between April 2019 through September 9, 2020, Joshua Lee Pulliam used a communication facility to communicate with Russell Bloom to direct Russell Bloom to where he could obtain Methamphetamine for the purpose of distributing the Metamphetamine throughout Clearfield County, Pennsylvania.



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: LEE	Last: PULLIAM

OFFENSE #5: CORRUPT ORGANIZATIONS: 911(B)(3)(4)

(2 counts)

1. On or between April 2019 through September 9, 2020, Joshua Lee Pulliam, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs, the trafficking of Methamphetamine, a Schedule II Controlled Substance, throughout Clearfield, Elk and Erie Counties, Pennsylvania, through a pattern of racketeering activity, as defined in Title 18 Pa. C.S. § 911(h)(1), all of which is in violation of Title 18 Pa. C.S. § 911(b)(3).
2. On or between April 2019 through September 9, 2020, Joshua Lee Pulliam, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a violation of Title 18 Pa.C.S. § 911 (b)(3), that is, on or between April 2019 through September 9, 2020, in Clearfield, Elk and Erie Counties, Pennsylvania, Joshua Lee Pulliam did conspire and agree with Thomas Edwin Wallace, Margaret Ann Wisor, Joshua Oscar Coles, Russell Bloom and others that they or one or more of them would conduct or participate, directly or indirectly, while employed by or associated with an enterprise engaged in commerce consisting of trafficking in controlled substances through a pattern of racketeering activity as defined in Title 18 Pa.C.S. § 911(h)(1), all of which is in violation of Title 18 Pa.C.S. § 911(b)(4).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: LEE	Last: PULLIAM

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 5.
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 statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Year)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: LEE	Last: PULLIAM

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Joshua Lee Pulliam and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

Attachment: Presentment from the Forty-Sixth Statewide Investigating Grand Jury

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

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

_____, Magisterial District Judge

My commission expires first Monday of January,

SEAL

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELK

Magisterial District Number: 59-3-02

MDJ: Hon. James L. Martin

Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

JOSHUA

OSCAR

COLES

First Name

Middle Name

Last Name

1146 WEST 20TH STREET, ERIE, PA 16502Ge
n

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed / /	OTN/LiveScan Number		Complaint/Incident Number BN7200072M		Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		DOB 07/06/1994		POB PENNSYLVANIA		Add'l DOB / /		Co-Defendant(s) <input type="checkbox"/>
		First Name		Middle Name		Last Name		Gen.
		AKA						
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown								
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown								
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)								
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)								
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location					WEIGHT (lbs.)	
FBI Number 762549TD1		MNU Number					130	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO							Ft. HEIGHT In.	
Fingerprint Classification:							5 6	
DEFENDANT VEHICLE INFORMATION								
Plate #		State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /		Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN		Year	Make	Model		Style	Color	Reg. same as Def. <input type="checkbox"/>

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

/ /
(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

(Name of the Affiant)

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

of Pennsylvania Office of Attorney General

PA0222400

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above☐ I accuse the defendant whose name is unknown to me but who is described as _____☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in ELK County

[]

on or about _____

(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: OSCAR	Last: COLES	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	1	UF		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED SUBSTANCE: 13(A)30**

Acts of the accused associated with this Offense: Joshua Oscar Coles, a person not being authorized by law to deliver and/or possess with the intent to deliver a controlled substance, did on or between June 18, 2020 through October 10, 2020 in Erie County, PA, deliver and/or possessed with the intent to deliver Methamphetamine, a Schedule II Controlled Substance, in violation of Section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	1	UM		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16**

Acts of the accused associated with this Offense: Joshua Oscar Coles, a person not being authorized by law to possess a controlled substance, did on or between June 18, 2020 through October 10, 2020 in Erie County, PA, knowingly or intentionally unlawfully possess Methamphetamine, a Schedule II Controlled Substance, in violation of Section 13(a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	--	---

<input type="checkbox"/>	3	903	A1	of the	TITLE 18	2	UF		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: OSCAR	Last: COLES	

Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
-------------------------	--	---	---	---

<input type="checkbox"/>	4	7512	A	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF A COMMUNICATION FACILITY: 7512A.**

Acts of the accused associated with this Offense: On or between June 18, 2020 through October 10, 2020 Joshua Oscar Coles, did knowingly, intentionally, and unlawfully use a communication facility to commit, cause or facilitate the commission or the attempt thereof of the crime of Possession With Intent to Deliver or Delivery of Methamphetamine, which constitutes a felony under the Controlled Substance, Drug, Device and Cosmetic Act, in violation of 18 Pa. C.S.A. §7512. To-wit: Joshua Oscar Coles used a communication facility to communicate with Thomas Edwin Wallace to arrange to purchase Methamphetamine from Thomas Edwin Wallace, to commit or attempt to commit the distribution of Methamphetamine, 35 P.S. §780-113(a)(30), throughout Erie County, Pennsylvania.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
-------------------------	--	---	---	---

<input type="checkbox"/>	5	911	B(3)(4)	of the	TITLE 18	2	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS: 911**

Acts of the accused associated with this Offense: see attached Page 4 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
-------------------------	--	---	---	---

<input type="checkbox"/>	6	5111	(A)(1)	of the	TITLE 18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES: 5111**

Acts of the accused associated with this Offense: Joshua Oscar Coles, did conduct financial transactions with the knowledge that the property involved including stolen or illegally obtained property, represents the proceeds of unlawful activity, the person acts with the intent to promote the carrying on of the unlawful activity, to-wit: On or about June 18, 2020 through October 10, 2020, Joshua Oscar Coles obtained and/or utilized proceeds from the illegal distribution of Methamphetamine to finance an illegal Methamphetamine distribution organization in violation of Title 18 Pa.C.S. § 5111(a)(1).



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: OSCAR	Last: COLES

OFFENSE DESCRIPTION CONTINUATION

OFFENSE #3:
CRIMINAL CONSPIRACY 903(A)1
(2 counts)

1. On or between June 18, 2020 thru October 10, 2020, Joshua Oscar Coles, with intent of promoting or facilitating the crime of Delivery of a controlled substance, did conspire and agree with Joshua Lee Pulliam and Thomas Edwin Wallace, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Delivering Methamphetamine, a Schedule II Controlled Substance, throughout Erie County, Pennsylvania, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).
2. On or between June 18, 2020 thru October 10, 2020, Joshua Oscar Coles, with intent of promoting or facilitating the crime of Possession With the Intent to Deliver a controlled substance, did conspire and agree with Joshua Lee Pulliam and Thomas Edwin Wallace, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possessing With the Intent to Deliver Methamphetamine, a Schedule II Controlled Substance, throughout Erie County, Pennsylvania, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).

OFFENSE #5:
CORRUPT ORGANIZATIONS: 911(B)(3)(4)
(2 counts)

1. On or between June 18, 2020 through October 10, 2020, Joshua Oscar Coles, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs, the trafficking of Methamphetamine, a Schedule II Controlled Substance, throughout Erie County, Pennsylvania, through a pattern of racketeering activity, as defined in Title 18 Pa. C.S. § 911(h)(1), all of which is in violation of Title 18 Pa. C.S. § 911(b)(3).
2. On or between June 18, 2020 through October 10, 2020, Joshua Oscar Coles, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a violation of Title 18 Pa.C.S. § 911 (b)(4), that is, on or between April 2019 through October 10, 2020, in Erie County, Pennsylvania, Joshua Oscar Coles did conspire and agree with Joshua Lee Pulliam and Thomas Edwin Wallace and others that they or one or more of them would conduct or participate, directly or indirectly, while employed by or associated with an enterprise engaged in commerce consisting of trafficking in controlled substances through a pattern of racketeering activity as defined in Title 18 Pa.C.S. § 911(h)(1), all of which is in violation of Title 18 Pa.C.S. § 911(b)(4).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: OSCAR	Last: COLES

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 4.
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 statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) _____ (Year) _____ (Signature of Affiant) _____

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)



**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: JOSHUA	Middle: OSCAR	Last: COLES

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Joshua Oscar Coles and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____
_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,

SEAL

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELK

Magisterial District Number: 59-3-02
MDJ: Hon. James L. Martin
Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

MARGARET

ANN

WISOR

First Name

Middle Name

Last Name

525 1ST AVENUE, JOHNSONBURG, PA 15845

Ge
n

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed / /	OTN/LiveScan Number		Complaint/Incident Number BN7007219T		Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female		DOB 11/30/1978		POB Pennsylvania		Add'l DOB / /		Co-Defendant(s) <input type="checkbox"/>	
		First Name		Middle Name		Last Name		Gen.	
		AKA							
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown									
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic									
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input checked="" type="checkbox"/> BLN (Blonde / Strawberry)									
Eye Color <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)									
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location				WEIGHT (lbs.)			
FBI Number 58772PPAC		MNU Number				115			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO						Ft. HEIGHT In.			
Fingerprint Classification:						5 7			
DEFENDANT VEHICLE INFORMATION									
Plate #		State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /		Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN		Year	Make	Model		Style	Color		

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

(Name of the Affiant)

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

of Pennsylvania Office of Attorney General

PA0222400

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in ELK County

[]

on or about

(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number BN7007219T
Defendant Name:	First: MARGARET	Middle: ANN	Last: WISOR	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	4	UF	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number _____		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED AND/OR COUNTERFEIT SUBSTANCE: 13(A)30								
Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	4	UM	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number _____		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16								
Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	3	780-113	32	of the	TITLE 35	4	UM	
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number _____		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MARGARET	Middle: ANN	Last: WISOR

Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	903	A1	of the	TITLE 18	10	UF		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**

Acts of the accused associated with this Offense: see attached Pages 6 and 7 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	7512	A	of the	TITLE 18	8	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF A COMMUNICATION FACILITY: 7512A.**

Acts of the accused associated with this Offense: see attached Pages 7 and 8 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	6	911	B(3)(4)	of the	TITLE 18	2	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS: 911**

Acts of the accused associated with this Offense: see attached Page 8 "Offense Continuation Page"



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MARGARET	Middle: ANN	Last: WISOR

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>	7	5111	A1	of the	TITLE 18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES: 5111(A)(1)**

Acts of the accused associated with this Offense: Margaret Ann Wisor, did conduct financial transactions with the knowledge that the property involved including stolen or illegally obtained property, represents the proceeds of unlawful activity, the person acts with the intent to promote the carrying on of the unlawful activity, to-wit: On or about August 2019 through August 2020, Margaret Ann Wisor obtained and/or utilized proceeds from the illegal distribution of Methamphetamine to finance her illegal Methamphetamine distribution organization in violation of Title 18 Pa.C.S. § 5111(a)(1).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MARGARET	Middle: ANN	Last: WISOR

OFFENSE DESCRIPTION CONTINUATION

OFFENSE #1:

DELIVERY AND/OR POSSESSION WITH THE INTENT TO DELIVER A CONTROLLED SUBSTANCE: 13(A)30
(4 counts)

Margaret Ann Wisor, a person not being authorized by law to deliver and/or possessed with the intent to deliver Methamphetamine, on the below listed dates and locations, did deliver and/or possessed with the intent to deliver Methamphetamine, a Schedule II Controlled Substance, in violation of Section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).

1. 08/23/2019 Delivered 0.97 grams of Methamphetamine to an undercover agent for \$100, in Johnsonburg, PA.
2. 09/05/2019 Delivered 7.33 grams of Methamphetamine to an undercover agent for \$480, in Johnsonburg, PA.
3. 09/27/2019 Delivered 13.87 grams of Methamphetamine to an undercover agent for \$500, in the Boro of Ridgway, PA.
4. 01/30/2020 Delivered 26.48 grams of Methamphetamine to an undercover agent for \$1,150, in Hamlin Township, PA.

OFFENSE #2:

POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16
(4 counts)

Margaret Ann Wisor, did knowingly or intentionally unlawfully possess a controlled substance, that is, on the below listed dates and locations, a person not being authorized by law to possess the controlled substance set forth herein, did knowingly or intentionally unlawfully possess Methamphetamine, a Schedule II Controlled Substance, in violation of Section 13(a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).

1. 08/23/2019 Possessed 0.97 grams of Methamphetamine, in the Boro of Johnsonburg, PA.
2. 09/05/2019 Possessed 7.33 grams of Methamphetamine, in the Boro of Johnsonburg, PA.
3. 09/27/2019 Possessed 13.87 grams of Methamphetamine, in the Boro of Ridgway, PA.
4. 01/30/2020 Possessed 26.48 grams of Methamphetamine, in Hamlin Township, PA.

OFFENSE #3:

THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32
(4 counts)

On the below listed dates, Margaret Ann Wisor did have the use of, or did possess with intent to use, drug paraphernalia, as listed below, for the purpose of compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, ingesting, inhaling, or otherwise introducing into the human body a controlled substance.

1. On 08/23/2019 plastic baggies, a straw and a scale
2. On 09/05/2019 plastic baggies and a scale
3. On 09/27/2019 plastic baggies and a scale
4. On 01/30/2020 a miniature glass mason jar, and a digital scale box



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MARGARET	Middle: ANN	Last: WISOR

OFFENSE #4: CRIMINAL CONSPIRACY 903(A)1 (10 counts)

1. On 09/05/2019 Margaret Ann Wisor, with intent of promoting or facilitating the crime of Delivery and/or Possession With the Intent to Deliver, a controlled substance, did conspire and agree with Ashley Bowley and Dustin Black, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possession with the Intent to Deliver and/or Delivery of 7.33 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).
2. On 09/05/2019 Margaret Ann Wisor, with intent of promoting or facilitating the crime of Possession of a controlled substance, did conspire and agree with Ashley Bowley and Dustin Black, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possessing 7.33 grams of Methamphetamine, a Schedule II Controlled Substance, in violation of section 13(a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).
3. On 09/27/2019 Margaret Ann Wisor, with intent of promoting or facilitating the crime of Delivery and/or Possession With the Intent to Deliver, a controlled substance, did conspire and agree with Michael Vandyne, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possession with the Intent to Deliver and/or Delivery of 13.87 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).
4. On 09/27/2019 Margaret Ann Wisor, with intent of promoting or facilitating the crime of Possession of a controlled substance, did conspire and agree with Michael Vandyne, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possessing 13.87 grams of Methamphetamine, a Schedule II Controlled Substance, in violation of section 13(a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).
5. On 11/01/2019 Margaret Ann Wisor, with intent of promoting or facilitating the crime of Delivery and/or Possession With the Intent to Deliver, a controlled substance, did conspire and agree with Andrew Hoover, James McDonald and, Joseph Amos Krise that they or one or more of them would engage in conduct which constitutes such crime or attempt or solicitation to commit such crime, and agreed to aid such other person(s) in the planning or commission of such crime or of an attempt or solicitation to commit such crime, TO WIT: Margaret Ann Wisor, Joseph Krise, Andrew Hoover and James McDonald conspired to purchase and distribute Methamphetamine, a Schedule II Controlled Substance, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).
6. On 01/30/2020 Margaret Ann Wisor, with intent of promoting or facilitating the crime of Delivery and/or Possession With the Intent to Deliver, a controlled substance, did conspire and agree with Rikki Lea Curcio, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possession with the Intent to Deliver and/or Delivery of 26.48 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).
7. On 01/30/2020 Margaret Ann Wisor, with intent of promoting or facilitating the crime of Possession of a controlled substance, did conspire and agree with Rikki Lea Curcio, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possessing 26.48 grams of Methamphetamine, a Schedule II Controlled Substance, in violation of section 13(a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).

**POLICE CRIMINAL COMPLAINT****OFFENSE CONTINUATION PAGE**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MARGARET	Middle: ANN	Last: WISOR

8. On or between April 2019 through October 10, 2020, Margaret Ann Wisor, with intent of promoting or facilitating the crime of Delivery and/or Possession With the Intent to Deliver, a controlled substance, did conspire and agree with Joshua Lee Pulliam, Thomas Edwin Wallace, and Russell Bloom, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possession with the Intent to Deliver and/or Delivery of Methamphetamine, a Schedule II Controlled Substance, throughout Clearfield, Elk and Erie Counties, Pennsylvania, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).
9. On or between April 2019 through October 10, 2020, Margaret Ann Wisor, with intent of promoting or facilitating the crime of Possession of a controlled substance, did conspire and agree with Joshua Lee Pulliam, Thomas Edwin Wallace, and Russell Bloom, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Possession of a controlled substance, throughout Clearfield, Elk and Erie Counties, Pennsylvania, in violation of section 13(a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).
10. On or between April 2019 through August 2020, Margaret Ann Wisor, directly or by virtue of her complicity did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or an attempt or solicitation to commit a crime, that is, on or between April 2019 through August, 2020, in Clearfield, Elk and Erie Counties, Pennsylvania, Margaret Ann Wisor did conspire and agree with Joshua Lee Pulliam, Thomas Edwin Wallace, Russell Bloom and others known and unknown, that they or one or more of them would engage in conduct constituting the crime of Dealing in Proceeds of Unlawful Activities, to include utilizing proceeds from the illegal distribution of Methamphetamine to finance her illegal Methamphetamine distribution organization in violation of Title 18 Pa.C.S. § 5111(a)(1), all of which is in violation of Title 18 Pa.C.S.A. § 903.

OFFENSE #5:**CRIMINAL USE OF A COMMUNICATION FACILITY: 7512(A)****(8 counts)**

Margaret Ann Wisor, did knowingly, intentionally, and unlawfully use a communication facility to commit, cause or facilitate the commission or the attempt thereof of the crime of Possession With Intent to Deliver or Delivery of Methamphetamine, which constitutes a felony under the Controlled Substance, Drug, Device and Cosmetic Act, in violation of 18 Pa. C.S.A. §7512. To-wit: On or about the below listed occurrences, Margaret Ann Wisor did engage in telephone conversations and/or text communications, with the below listed person(s), to commit or attempt to commit the distribution of Methamphetamine, 35 P.S. §780-113(a)(30), throughout Clearfield, Elk and Erie Counties, Pennsylvania.

1. On or between April 2019 through September 9, 2020, Margaret Ann Wisor used a communication facility to communicate with Joshua Lee Pulliam.
2. On or between April 2020 through September 2020, Margaret Ann Wisor used a communication facility to communicate with Russell Bloom.
3. On or between April 2020 through August 2020, Margaret Ann Wisor used a communication facility to communicate with Thomas Edin Wallace.
4. On 08/23/2019 Margaret Ann Wisor used a cellular telephone to communicate with an undercover agent.
5. On 09/05/2019 Margaret Ann Wisor used a cellular telephone to communicate with an undercover agent.
6. On 09/27/2019 Margaret Ann Wisor used a cellular telephone to communicate with an undercover agent.
7. On 11/01/2019 Margaret Ann Wisor used a cellular telephone to communicate with an undercover agent.
8. On 01/30/2020 Margaret Ann Wisor used a cellular telephone to communicate with an undercover agent.



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MARGARET	Middle: ANN	Last: WISOR

OFFENSE #6:

CORRUPT ORGANIZATIONS: 911(B)(3)(4)

(2 counts)

1. On or between April 2019 through August 2020, Margaret Ann Wisor, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs, the trafficking of Methamphetamine, a Schedule II Controlled Substance, throughout Clearfield, Elk and Erie Counties, Pennsylvania, through a pattern of racketeering activity, as defined in Title 18 Pa. C.S. § 911(h)(1), all of which is in violation of Title 18 Pa. C.S. § 911(b)(3).
2. On or between April 2019 through August 2020, Margaret Ann Wisor, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a violation of Title 18 Pa.C.S. § 911 (b)(3), that is, on or between April 2019 through August 2020, in Clearfield, Elk and Erie Counties, Pennsylvania, Margaret Ann Wisor did conspire and agree with Joshua Lee Pulliam, Thomas Edwin Wallace, Russell Bloom and others that they or one or more of them would conduct or participate, directly or indirectly, while employed by or associated with an enterprise engaged in commerce consisting of trafficking in controlled substances through a pattern of racketeering activity as defined in Title 18 Pa.C.S. § 911(h)(1), all of which is in violation of Title 18 Pa.C.S. § 911(b)(4).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MARGARET	Middle: ANN	Last: WISOR

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 8.
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 statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) _____ (Year) _____ (Signature of Affiant) _____

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MARGARET	Middle: ANN	Last: WISOR

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Margaret Ann Wisor and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

Attachment: Presentment from the Forty-Sixth Statewide Investigating Grand Jury

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____
_____, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELKMagisterial District Number: 59-3-02
MDJ: Hon. James L. Martin
Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663



DEFENDANT:

MICHAEL

First Name

ELK COUNTY PRISON

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

(NAME and ADDRESS):

JAMES

Middle Name

VANDYNE

Last Name

Gen

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 08/17/1985	POB Pennsylvania	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name		Middle Name		Last Name
AKA				
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown				
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)				
Eye Color <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)				
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number 53857HC4	MNU Number			190
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.
Fingerprint Classification:				5 6

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

/ /
(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

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

of Pennsylvania Office of Attorney General

PA0222400

(Police Agency ORI Number)

(Identify Department or Agency Represented and Political Subdivision)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above☐ I accuse the defendant whose name is unknown to me but who is described as _____☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in ELK County

[]

on or about _____

(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MICHAEL	Middle: JAMES	Last: VANDYNE

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	1	UF		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED SUBSTANCE: 13(A)30**

Acts of the accused associated with this Offense:

09/27/2019 Delivered 13.87 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent for \$500, in the Boro of Ridgway, PA.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	1	UM		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16**

Acts of the accused associated with this Offense:

09/27/2019 Possessed 13.87 grams of Methamphetamine, a Schedule II Controlled Substance

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	3	780-113	32	of the	TITLE 35	1	UM		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32**

Acts of the accused associated with this Offense:

On the 09/27/2019, Michael James Vandyne, did have the use of, or did possess with intent to use, drug paraphernalia, namely plastic baggies, for the purpose of compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, ingesting, inhaling, or otherwise introducing into the human body a controlled substance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MICHAEL	Middle: JAMES	Last: VANDYNE

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	--	---

<input type="checkbox"/>	4	903	A1	of the	TITLE 18		UF		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**

Acts of the accused associated with this Offense:

On 09/27/2019 Michael James Vandyne, with intent of promoting or facilitating the crime of Delivery of a controlled substance, did conspire and agree with Margaret Ann Wisor, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Delivering 13.87 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

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

Acts of the accused associated with this Offense:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MICHAEL	Middle: JAMES	Last: VANDYNE

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 3.
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 statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Year)

(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: MICHAEL	Middle: JAMES	Last: VANDYNE

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Michael James Vandyne and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

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

_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,

SEAL

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELK

Magisterial District Number: 59-3-02
MDJ: Hon. James L. Martin
Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

RIKKI

LEA

CURCIO

First Name

Middle Name

Last Name

Gen

213 BUSHNELL ST. BUILDING #2, BRADFORD, PA

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: _____
☐ 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition
☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed		OTN/LiveScan Number		Complaint/Incident Number		Request Lab Services?	
						BN7007219T		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER		DOB 01/20/1992		POB Pennsylvania		Add'l DOB		Co-Defendant(s)	
<input type="checkbox"/> Male <input checked="" type="checkbox"/> Female		First Name		Middle Name		Last Name		Gen.	
RACE		<input checked="" type="checkbox"/> White		<input type="checkbox"/> Asian		<input type="checkbox"/> Black		<input type="checkbox"/> Native American	
ETHNICITY		<input type="checkbox"/> Hispanic		<input checked="" type="checkbox"/> Non-Hispanic		<input type="checkbox"/> Unknown			
Hair Color		<input type="checkbox"/> GRY (Gray)		<input type="checkbox"/> RED (Red/Aubn.)		<input type="checkbox"/> SDY (Sandy)		<input type="checkbox"/> BRO (Brown)	
		<input type="checkbox"/> BLK (Black)		<input type="checkbox"/> ONG (Orange)		<input type="checkbox"/> WHI (White)		<input type="checkbox"/> PLE (Purple)	
		<input checked="" type="checkbox"/> BLN (Blonde / Strawberry)				<input type="checkbox"/> XXX (Unk./Bald)		<input type="checkbox"/> GRN (Green)	
Eye Color		<input type="checkbox"/> BLK (Black)		<input checked="" type="checkbox"/> BLU (Blue)		<input type="checkbox"/> BRO (Brown)		<input type="checkbox"/> GRY (Gray)	
		<input type="checkbox"/> HAZ (Hazel)		<input type="checkbox"/> MAR (Maroon)		<input type="checkbox"/> PNK (Pink)		<input type="checkbox"/> MUL (Multicolored)	
DNA		<input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location		WEIGHT (lbs.)			
FBI Number		6118X09T8		MNU Number		125			
Defendant Fingerprinted		<input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.			
Fingerprint Classification:						5		2	

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat	Registration Sticker (MM/YY)	Comm'l Veh. Ind.	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
VIN		<input type="checkbox"/>	Year Make	Model	Style	Color	<input type="checkbox"/>

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, AGENT RANDALL T. SCHIRRA SR.

(Name of the Affiant)

282

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

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at []

(Subdivision Code) (Place-Political Subdivision)

in ELK County

[]

on or about

(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number BN7007219T
Defendant Name:	First: RIKKI	Middle: LEA	Last: CURCIO	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	1	UF		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED SUBSTANCE: 13(A)30									
Acts of the accused associated with this Offense: On 01/30/2020 Rikki Curcio did Possess with the intent to Delier and/or Delivered 26.48 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent for \$1,150, in Hamlin Township, PA.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	1	UM		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16									
Acts of the accused associated with this Offense: 01/30/2020 Possessed 26.48 grams of Methamphetamine, a Schedule II Controlled Substance									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	3	780-113	32	of the	TITLE 35		UM		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32									
Acts of the accused associated with this Offense: On 01/30/2020, Rikki Lea Curcio, did have the use of, or did possess with intent to use, drug paraphernalia, namely a miniature glass mason jar and a digital scale box, for the purpose of compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, ingesting, inhaling, or otherwise introducing into the human body a controlled substance.									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: RIKKI	Middle: LEA	Last: CURCIO

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	4	903	A1	of the	TITLE 18		UF		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY 903(A)1									
Acts of the accused associated with this Offense: On 01/30/2020 Rikki Lea Curcio, with intent of promoting or facilitating the crime of Possession with the Intent to Deliver and/or Delivery of a controlled substance, did conspire and agree with Margaret Wisor, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Delivering 26.48 grams of Methamphetamine, a Schedule II Controlled Substance, to an undercover agent.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	5	7512	A	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): CRIMINAL USE OF A COMMUNICATION FACILITY: 7512A.									
Acts of the accused associated with this Offense: On 01/30/2020 Rikki Curcio used a cellular telephone to communicate with Margaret Wisor to arrange to deliver Methamphetamine to an undercover agent.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance):									
Acts of the accused associated with this Offense:									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: RIKKI	Middle: LEA	Last: CURCIO

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 3.
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 statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) _____ (Year) _____ (Signature of Affiant) _____

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7007219T
Defendant Name:	First: RIKKI	Middle: LEA	Last: CURCIO

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Rikki Lea Curcio and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____
_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ELK

Magisterial District Number: 59-3-02

MDJ: Hon. James L. Martin

Address: 409-G Center Street,
Johnsonburg, PA 15845

Telephone: (814)965-2663

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

THOMAS

EDWIN

WALLACE

First Name

Middle Name

Last Name

Ge
n1122 EAST 33RD STREET, ERIE, PA 16504

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed / /		OTN/LiveScan Number		Complaint/Incident Number BN7200072M		Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		DOB 07/15/1984		POB Indiana		Add'l DOB / /		Co-Defendant(s) <input type="checkbox"/>	
		First Name		Middle Name		Last Name		Gen.	
		AKA							
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown									
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown									
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown)									
<input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input checked="" type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink)									
<input type="checkbox"/> BLN (Blonde / Strawberry)									
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray)									
<input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)									
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location				WEIGHT (lbs.)			
FBI Number		MNU Number				280			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO						Ft. HEIGHT In.			
Fingerprint Classification:						5		10	
DEFENDANT VEHICLE INFORMATION									
Plate #		State		Haz mat <input type="checkbox"/>		Registration Sticker (MM/YY) /		Comm'l Veh. Ind. <input type="checkbox"/>	
VIN		Year		Make		Model		Style	
								Color	
								Reg. same as Def. <input type="checkbox"/>	

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG ROGER BAUER

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

/ /
(Date)

I, AGENT RANDALL T. SCHIRRA SR.

282

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

of Pennsylvania Office of Attorney General

PA0222400

(Police Agency ORI Number)

(Identify Department or Agency Represented and Political Subdivision)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above☐ I accuse the defendant whose name is unknown to me but who is described as _____☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have
therefore designated as John Doe or Jane Doewith violating the penal laws of the Commonwealth of Pennsylvania at []
(Subdivision Code) (Place-Political Subdivision)

in ELK County [] on or about

(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: THOMAS	Middle: EDWIN	Last: WALLACE

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	1	780-113	A30	of the	TITLE 35	5	UF		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- DELIVERY OF A CONTROLLED SUBSTANCE: 13(A)30									
Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	2	780-113	A16	of the	TITLE 35	5	UM		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16									
Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	3	780-113	32	of the	TITLE 35	5	UM		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT, ACT 64 OF APRIL 14, 1972 -- THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN7200072M
Defendant Name:	First: THOMAS	Middle: EDWIN	Last: WALLACE

Acts of the accused associated with this Offense: see attached Page 5 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	903	A1	of the	TITLE 18	2	UF		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY 903(A)1**

Acts of the accused associated with this Offense: see attached Page 6 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	7512	A	of the	TITLE 18	7	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF A COMMUNICATION FACILITY: 7512A.**

Acts of the accused associated with this Offense: see attached Page 6 "Offense Continuation Page"

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	6	911	B(3)(4)	of the	TITLE 18	2	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS: 911**

Acts of the accused associated with this Offense: see attached Page 7 "Offense Continuation Page"



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	7	5111	(A)(1)	of the	TITLE 18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES: 5111**

Acts of the accused associated with this Offense: Thomas Edwin Wallace, did conduct financial transactions with the knowledge that the property involved including stolen or illegally obtained property, represents the proceeds of unlawful activity, the person acts with the intent to promote the carrying on of the unlawful activity, to-wit: On or about April 2019 through October 10, 2020, Thomas Edwin Wallace obtained and/or utilized proceeds from the illegal distribution of Methamphetamine to finance his illegal Methamphetamine distribution organization in violation of Title 18 Pa.C.S. § 5111(a)(1).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

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Defendant Name:	First: THOMAS	Middle: EDWIN	Last: WALLACE

OFFENSE DESCRIPTION CONTINUATION

OFFENSE #1:

**DELIVERY AND/OR POSSESSION WITH THE INTENT TO DELIVER A CONTROLLED SUBSTANCE: 13(A)30
(5 counts)**

Thomas Edwin Wallace, a person not being authorized by law to deliver and/or possessed with the intent to deliver Methamphetamine, and on the below listed dates and locations, did deliver and/or possessed with the intent to deliver Methamphetamine, a Schedule II Controlled Substance, in violation of Section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).

1. 07/17/2020 Delivered 84.75 grams of Methamphetamine, to C17-023-20 for \$2,700, in the City of Erie, PA.
2. 08/11/2020 Delivered 83.41 grams of Methamphetamine, to C17-023-20 for \$2,700, in the City of Erie, PA.
3. 08/29/2020 Delivered 111.16 grams of Methamphetamine, to an undercover agent for \$3,600, in the City of Erie, PA.
4. 09/24/2020 Delivered 112.15 grams of Methamphetamine, to an undercover agent for \$3,200, in Millcreek Twp., PA.
5. 10/10/2020 Possessed With the Intent to Deliver 3,904.12 grams of Methamphetamine, in the City of Erie, PA.

OFFENSE #2:

**POSSESSION OF A CONTROLLED SUBSTANCE: 13(A)16
(5 counts)**

Thomas Edwin Wallace, did knowingly or intentionally unlawfully possess a controlled substance, that is, on the below listed dates and locations, a person not being authorized by law to possess the controlled substance set forth herein, did knowingly or intentionally unlawfully possess Methamphetamine, a Schedule II Controlled Substance, in violation of Section 13(a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).

1. 07/17/2020 Possessed 84.75 grams of Methamphetamine, in the City of Erie, PA.
2. 08/11/2020 Possessed 83.41 grams of Methamphetamine, in the City of Erie, PA.
3. 08/29/2020 Possessed 111.16 grams of Methamphetamine, in the City of Erie, PA.
4. 09/24/2020 Possessed 112.15 grams of Methamphetamine, in Millcreek Township, PA.
5. 10/10/2020 Possessed 3,904.12 grams of Methamphetamine, in the City of Erie, PA.

OFFENSE #3:

**THE USE OF, OR POSSESSION WITH THE INTENT TO USE, DRUG PARAPHERNALIA: 13(A)32
(5 counts)**

On the below listed dates, Thomas Edwin Wallace did have the use of, or did possess with intent to use, drug paraphernalia, as listed below, for the purpose of compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, ingesting, inhaling, or otherwise introducing into the human body a controlled substance, in violation of section 13(a)(32) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(32).

1. 07/17/2020 a Family Dollar shopping bag and sandwich bags
2. 08/11/2020 sandwich bags
3. 08/29/2020 sandwich bags
4. 09/24/2020 sandwich bags
5. 10/10/2020 food saver bags, shipping box, green draw string backpack, Tupperware container



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

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OFFENSE #4:
CRIMINAL CONSPIRACY 903(A)1
(4 counts)

1. On or between April 2019 through October 10, 2020, Thomas Edwin Wallace, with intent of promoting or facilitating the crime of Delivery and/or Possession With the Intent to Deliver, a controlled substance, did conspire and agree with Joshua Lee Pulliam, Margaret Wisor, Joshua Oscar Coles and Russell Bloom, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of Delivering and/or Possessed With the Intent to Deliver, Methamphetamine, a Schedule II Controlled Substance, throughout Clearfield, Elk and Erie Counties, Pennsylvania, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).
2. On or between April 2019 through October 10, 2020, Thomas Edwin Wallace, directly or by virtue of his complicity did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or an attempt or solicitation to commit a crime, that is, on or between April 2019 through October 10, 2020, in Clearfield, Elk and Erie Counties, Pennsylvania, Thomas Edwin Wallace did conspire and agree with Joshua Lee Pulliam, Margaret Ann Wisor, Joshua Oscar Coles, Russell Bloom and others known and unknown, that they or one or more of them would engage in conduct constituting the crime of Dealing in Proceeds of Unlawful Activities, to include utilizing proceeds from the illegal distribution of Methamphetamine to finance his illegal Methamphetamine distribution organization in violation of Title 18 Pa.C.S. § 5111(a)(1), all of which is in violation of Title 18 Pa.C.S.A. § 903.

OFFENSE #5:
CRIMINAL USE OF A COMMUNICATION FACILITY: 7512(A)
(7 counts)

Thomas Edwin Wallace, did knowingly, intentionally, and unlawfully use a communication facility to commit, cause or facilitate the commission or the attempt thereof of the crime of Possession With Intent to Deliver or Delivery of Methamphetamine, which constitutes a felony under the Controlled Substance, Drug, Device and Cosmetic Act, in violation of 18 Pa. C.S.A. §7512. To-wit: On or about the below listed occurrences, Thomas Edwin Wallace did engage in telephone conversations and/or text communications, with the below listed person(s), to commit or attempt to commit the distribution of Methamphetamine, 35 P.S. §780-113(a)(30), throughout Clearfield, Elk and Erie Counties, Pennsylvania.

1. On or between April 2019 through September 9, 2020, Thomas Edwin Wallace used a communication facility to communicate with Joshua Lee Pulliam.
2. On or between November 2019 through September 2020, Thomas Edwin Wallace used a communication facility to communicate with Russell Bloom.
3. July 17, 2020 Thomas Edwin Wallace used a communication facility to communicate with CI7-023-20.
4. August 11, 2020 Thomas Edwin Wallace used a communication facility to communicate with CI7-023-20.
5. August 29, 2020 Thomas Edwin Wallace used a communication facility to communicate with an undercover agent.
6. September 24, 2020 Thomas Edwin Wallace used a communication facility to communicate with an undercover agent.
7. On or between June 18, 2020 thru October 10, 2020 Thomas Edwin Wallace used a communication facility to communicate with Joshua Coles.



POLICE CRIMINAL COMPLAINT

OFFENSE CONTINUATION PAGE

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OFFENSE #6:

CORRUPT ORGANIZATIONS: 911(B)(3)(4)

(2 counts)

1. On or between April 2019 through October 10, 2020, Thomas Edwin Wallace, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs, the trafficking of Methamphetamine, a Schedule II Controlled Substance, throughout Clearfield, Elk and Erie Counties, Pennsylvania, through a pattern of racketeering activity, as defined in Title 18 Pa. C.S. § 911(h)(1), all of which is in violation of Title 18 Pa. C.S. § 911(b)(3).
2. On or between April 2019 through October 10, 2020, Thomas Edwin Wallace, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a violation of Title 18 Pa.C.S. § 911 (b)(4), that is, on or between April 2019 through October 10, 2020, in Clearfield, Elk and Erie Counties, Pennsylvania, Thomas Edwin Wallace did conspire and agree with Joshua Lee Pulliam, Margaret Ann Wisor, Joshua Oscar Coles, Russell Bloom and others that they or one or more of them would conduct or participate, directly or indirectly, while employed by or associated with an enterprise engaged in commerce consisting of trafficking in controlled substances through a pattern of racketeering activity as defined in Title 18 Pa.C.S. § 911(h)(1), all of which is in violation of Title 18 Pa.C.S. § 911(b)(4).



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Defendant Name:	First: THOMAS	Middle: EDWIN	Last: WALLACE

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 7.
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 statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) _____ (Year) _____ (Signature of Affiant) _____

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: THOMAS	Middle: EDWIN	Last: WALLACE

AFFIDAVIT of PROBABLE CAUSE

1. Your affiant is Randall T. Schirra Sr., a Narcotics Agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your affiant, the Forty-Sixth Statewide Investigating Grand Jury, and the Office of Attorney General have been conducting a criminal narcotics investigation into suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device and Cosmetic Act (Act 64), as well as the Pennsylvania Crimes Code, by Thomas Edwin Wallace and others.
2. Your affiant alleges that the evidentiary results of this investigation and the investigational efforts of the Forty-Sixth Statewide investigating Grand Jury, as reported in the Presentment, which is attached hereto and made part of this affidavit of criminal complaint, demonstrate the existence of violations of Act 64 as well as the Pennsylvania Crimes Code. Your affiant has reviewed this presentment and finds that the findings found therein correspond with the results of your affiant's investigative results to date. Furthermore, the presentment of the Grand Jury shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it, as well as physical evidence presented to it.
3. Your affiant has reviewed the evidence presented before the Statewide Investigating Grand Jury and finds that it comports with the results of the investigative efforts and findings by your affiant and other law enforcement officers, which was related to your affiant as to the allegations contained in the criminal complaint. Additionally, the aforementioned presentment was reviewed and approved by the Supervising Judge of the Forty-Sixth Statewide Investigating Grand Jury, who by order, directed that appropriate criminal charges be initiated and prosecuted by the Pennsylvania Office of Attorney General in Elk County, PA.

Attachment: Presentment from the Forty-Sixth Statewide Investigating Grand Jury

I, AGENT RANDALL T. SCHIRRA SR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

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

_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,

SEAL