

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PERRY



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

Magisterial District Number: 41-3-05
MDJ: Hon. Elizabeth R. Frownfelter
Address: 3553 Shermans Valley Road
Loysville, PA 17047

DEFENDANT:

(NAME and ADDRESS):

ANTHONY

LEMING

First Name

Middle Name

Last Name

80 Main Street
Berwick, PA 18603

Telephone: (717)789-4117

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-428-21	Date Filed 8/29/21	OTN/LiveScan Number R168963-4	Complaint/Incident Number BN3200109XM 9	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 7/12/1969	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name	Middle Name	Last Name	Gen.	
AKA				

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 **936224XA2** MNU Number **188**

Defendant Fingerprinted YES 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"/>	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 ROBERT SMULKITIS

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

08/22/2021

(Date)

I, AGENT KURT ZITSCH

(Name of the Affiant)

BNIDC - #621

(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 [214] Various Locations (Subdivision Code) (Place-Political Subdivision)

in PERRY County

[50]

(County Code)

on or about JULY 23, 2020 TO MAY 19, 2021



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ANTHONY	Middle:	Last: LEMING

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate.

When there is more than one offense, each offense should be numbered chronologically.

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

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

<input checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry and elsewhere, while employed or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

<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	911	(B)(4)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	--	---

<input type="checkbox"/>	3	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Anthony Leming, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Marc Bankes, Michael Rowello, Oksana Reed, Chelsey Andrews, Thomas Priar, Bradley Trump, Douglas Farner, Nikolaus Andrews, Barry Melhorn, Scott Reabuck, and others, that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



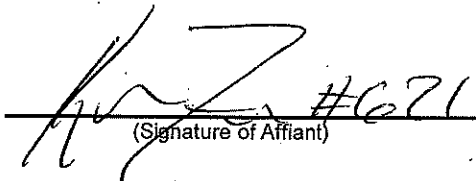
POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ANTHONY	Middle:	Last: LEMING

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

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

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

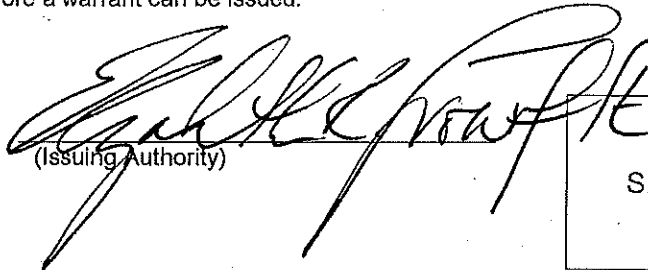

#621
(Signature of Affiant)

(Date)

AND NOW, on this date 8/29/21 I certify that the complaint has been properly completed and verified.

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

41-3-05
(Magisterial District Court Number)


(Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ANTHONY	Middle:	Last: LEMING

AFFIDAVIT of PROBABLE CAUSE

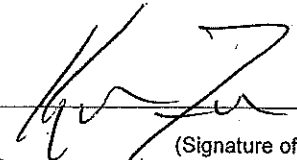
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

Your affiant requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

I, AGENT KURT ZITSCH, 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.

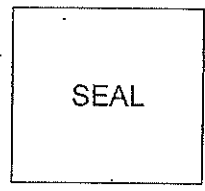
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

 #621
(Signature of Affiant)

Sworn to me and subscribed before me this 19 day of August 2021

Date Elizabeth Nowak, Magisterial District Judge

My commission expires first Monday of January, 2024.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PERRY

Magisterial District Number: 41-3-05
MDJ: Hon. Elizabeth R. Frownfelter
Address: 3553 Shermans Valley Road
Loysville, PA 17047

Telephone: (717)789-4117



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

BRADLEY

ALLEN

TRUMP

First Name

Middle Name

Last Name

88 Rock Hollow Road
Elliottsburg, PA 17024

Ge
n

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-429-21	Date Filed 8/29/21	OTN/LiveScan Number R 168966-0	Complaint/Incident Number BN3200109XM 10	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
-----------------------------------	------------------------------	--	--	---

GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 01/13/1981	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
AKA	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 <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 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 type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input checked="" 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.) 160
FBI Number 358388KB1	MNU Number	Ft. HEIGHT In. 6 0
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		
Fingerprint Classification:		

DEFENDANT VEHICLE INFORMATION

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

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

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

SDAG ROBERT SMULKTIS

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

08/22/2021

(Date)

I, **AGENT KURT ZITSCH**

BNIDC - #621

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

(Name of the Affiant)

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 [214] **Various Locations**
(Subdivision Code) (Place-Political Subdivision)

in PERRY County [50] on or about **JULY 23, 2020 TO MAY 19, 2021**
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BRADLEY	Middle: ALLEN	Last: TRUMP

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

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

<input checked="" type="checkbox"/> Lead?	1	911	(B)(3)	of the	TITLE 18	1	F1		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

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

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry, Pennsylvania and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

<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"/> Lead?	2	911	(B)(4)	of the	TITLE 18	1	F1		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

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

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry, Pennsylvania and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	---	---

<input type="checkbox"/> Lead?	3	780-113	(A)(30)	of the	TITLE 35	1	F		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Bradley Trump, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Marc Bankes, Nikolaus Andrews, Oksana Reed, Thomas Priar, Chelsey Andrews, Douglas Farner, Barry Melhorn, Michael Rowello, Scott Reabuck, and others; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BRADLEY	Middle: ALLEN	Last: TRUMP

<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"/> Lead?	4	780-113	(A)(30)	of the	TITLE 35	1	F	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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Bradley Trump, within Elliottsburg, Perry County, on or about January 14, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to a confidential information (CI) with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said 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"/> Lead?	5	780-113	(A)(30)	of the	TITLE 35	1	F	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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Bradley Trump, within Elliottsburg, Perry County, on or about January 14, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: Fentanyl, to a confidential information (CI) with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said 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"/> Lead?	6	780-113	(A)(30)	of the	TITLE 35	1	F	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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Bradley Trump, within Elliottsburg, Perry County, on or about January 22, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to a confidential information (CI) with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said controlled substance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BRADLEY	Middle: ALLEN	Last: TRUMP

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"/> Lead?	7	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Bradley Trump, within Ellittsburg, Perry County, on or about January 22, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: FENTANYL, to a confidential information (CI) with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said 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"/> Lead?	8	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Bradley Trump, within Ellittsburg, Perry County, on or about February 3, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to a confidential information (CI) with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said 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"/> Lead?	9	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Bradley Trump, within Ellittsburg, Perry County, on or about February 3, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: FENTANYL, to a confidential information (CI) with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said controlled substance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BRADLEY	Middle: ALLEN	Last: TRUMP

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"/>	10	780-113	(A)(30)	of the	TITLE 35	1	F		
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): PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)									
Acts of the accused associated with this Offense: The defendant, Bradley Trump, in Ellittsburg, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Methamphetamine, a Schedule II Controlled Substance, on or about February 4, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.									

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"/>	11	780-113	(A)(30)	of the	TITLE 35	1	F		
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): PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)									
Acts of the accused associated with this Offense: The defendant, Bradley Trump, in Ellittsburg, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Marijuana and/or THC, a Schedule I Controlled Substance, on or about February 4, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.									

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"/>	12	780-113	(A)(30)	of the	TITLE 35	1	F		
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): PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)									
Acts of the accused associated with this Offense: The defendant, Bradley Trump, in Ellittsburg, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Methamphetamine, a Schedule II Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BRADLEY	Middle: ALLEN	Last: TRUMP

<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"/>	13	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Bradley Trump, in Ellittsburg, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Marijuana and/or THC, a Schedule I Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/>	14	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: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Bradley Trump, in Perry County and elsewhere, did use a communication device, namely a cellular telephone, to arrange transactions of Methamphetamine and/or Heroin/Fentanyl and/or Marijuana between the time frame of January 14, 2021 and May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)

<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:

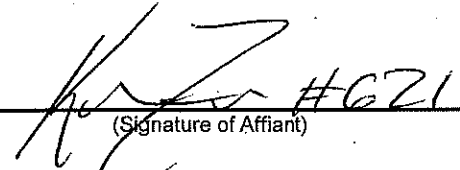


POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BRADLEY	Middle: ALLEN	Last: TRUMP

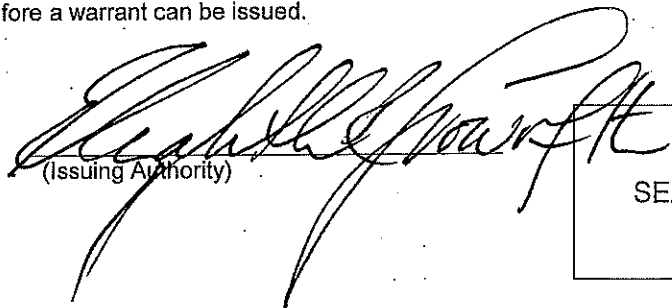
- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)


 (Signature of Affiant)

(Date) _____
 AND NOW, on this date 8/29/21 I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

41-3-05
 (Magisterial District Court Number)


 (Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BRADLEY	Middle: ALLEN	Last: TRUMP

AFFIDAVIT of PROBABLE CAUSE

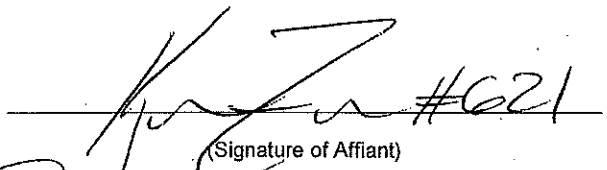
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

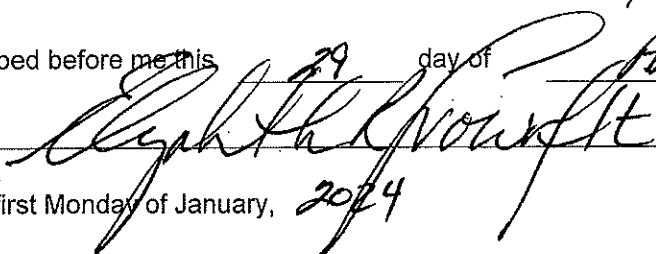
Your affiant requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

I, AGENT KURT ZITSCH, 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.

 #621
(Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021

Date 29 August 2021  Magisterial District Judge

My commission expires first Monday of January, 2024

SEAL

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PERRY



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 41-3-05
MDJ: Hon. Elizabeth R. Frownfelter
Address: 3553 Shermans Valley Road
Loysville, PA 17047

DEFENDANT: (NAME and ADDRESS):
CHELSEY MEGAN ANDREWS
First Name Middle Name Last Name

2867 County Line Road
Riegelsville, PA 18077

Telephone: (717)789-4117

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-430-21	Date Filed 8/29/21	OTN/LiveScan Number R 168968-2	Complaint/Incident Number BN3200109XM 11	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 12/08/1984	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
AKA	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 <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 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 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.) 120
FBI Number 347289FH8	MNU Number	Ft. HEIGHT in. 5 4
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:	

DEFENDANT VEHICLE INFORMATION

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

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

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

SDAG ROBERT SMULKITIS

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

08/22/2021

(Date)

I, AGENT KURT ZITSCH

(Name of the Affiant)

BNIDC - #621

(PSP/MPDET - 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 [214] Various Locations

(Subdivision Code) (Place/Political Subdivision)

in PERRY County

[50]

(County Code)

on or about JULY 23, 2020 TO MAY 19, 2021



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: CHELSEY	Middle: MEGAN	Last: ANDREWS

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

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

<input checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry, Pennsylvania and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

<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	911	(B)(4)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	---	---

<input type="checkbox"/>	3	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Chelsey Andrews, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Marc Bankes, Nikolaus Andrews, Oksana Reed, Thomas Priar, Bradley Trump, Douglas Farner, Barry Melhorn, Michael Rowello, Scott Reabuck, and others,; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: CHELSEY	Middle: MEGAN	Last: ANDREWS

<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"/>	4	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Chelsey Andrews, within Carlisle, Cumberland County, on or about January 15, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to Pennsylvania State Police Trooper Wes Johnson, with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendnat not being authorized or licensed by law to possess said 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"/>	5	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Chelsey Andrews, within Carlisle, Cumberland County, on or about January 15, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: FENTANYL, to Pennsylvania State Police Trooper Wes Johnson, with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendnat not being authorized or licensed by law to possess said 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"/>	6	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Chelsey Andrews, within Mechanicsburg, Cumberland County, on or about February 9, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to Pennsylvania State Police Trooper Wes Johnson, with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendnat not being authorized or licensed by law to possess said controlled substance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: CHELSEY	Middle: MEGAN	Last: ANDREWS

<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"/> Lead?	7	7512	A	of the	TITLE 18	1	F3		
	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: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Chelsey Andrews, within Cumberland County, and elsewhere, did use a communication device, namely a cellular telephone, to arrange transactions of Methamphetamine and/or Heroin/Fentanyl between the time frame of January 15, 2021 and May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)

<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"/> Lead?				of the					
	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"/> Lead?				of the					
	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 BN3200109XM
Defendant Name:	First: CHELSEY	Middle: MEGAN	Last: ANDREWS

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. 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.

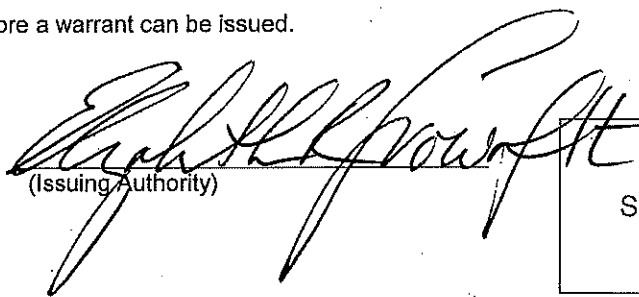
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

_____ (Date) _____

 (Signature of Affiant)

AND NOW, on this date 8/29/21 I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

41-3-05
 (Magisterial District Court Number)


 (Issuing Authority) SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: CHELSEY	Middle: MEGAN	Last: ANDREWS

AFFIDAVIT of PROBABLE CAUSE

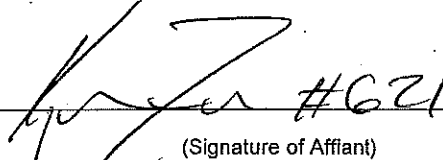
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

Your affiant requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

I, AGENT KURT ZITSCH, 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.

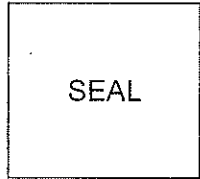
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.


 (Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August, 2021

Date , Magisterial District Judge

My commission expires first Monday of January, 2021



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: PERRY



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 41-3-05
MDJ: Hon. Elizabeth R. Frownfelter
Address: 3553 Shermans Valley Road
Loysville, PA 17047

DEFENDANT: (NAME and ADDRESS):
MARC ALLEN BANKES
First Name Middle Name Last Name

3000 Old Berwick Road
Bloomsburg, PA 17815

Telephone: (717)789-4117

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-431-21	Date Filed 8/29/21	OTN/LiveScan Number R 168970-4	Complaint/Incident Number BN3200109XM 1Z	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 07/04/1976	POB	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)	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.) 320
FBI Number 909617AE3	MNU Number	Ft. HEIGHT In. 6 0
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		
Fingerprint Classification:		

DEFENDANT VEHICLE INFORMATION

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

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

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

SDAG ROBERT SMULKTTIS

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

08/22/2021

(Date)

I, AGENT KURT ZITSCH

BNIDC - #621

(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 [214] Various Locations
(Subdivision Code) (Place-Political Subdivision)

in PERRY County

[50]

(County Code)

on or about JULY 23, 2020 TO MAY 19, 2021



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: MARC	Middle: ALLEN	Last: BANKES

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 checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Columbia, Pennsylvania and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl) and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

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

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry, Pennsylvania and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30).

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	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Marc Bankes, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Columbia County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Bradley Trump, Nikolaus Andrews, Oksana Reed, Thomas Priar, Chelsey Andrews, Douglas Farner, Barry Melhorn, Scott Rowello, Michael Reabuck, and others,; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: MARC	Middle: ALLEN	Last: BANKES

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	780-113	(A)(30)	of the	TITLE 35	2	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Marc Bankes, in Bloomsburg and Berwick, Columbia County, did knowingly possess with the intent to deliver a controlled substance, namely, Methamphetamine, a Schedule II Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

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	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Marc Bankes, in Berwick, Columbia County, did knowingly possess with the intent to deliver a controlled substance, namely, Marijuana, a Schedule I Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

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	780-113 7512	(A)(30)	of the	TITLE 35 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: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Marc Bankes, in Columbia County and elsewhere, did use a communication device, namely a cellular telephone, to arrange transactions of Methamphetamine and/or Marijuana between the time frame of April 7, 2021 to May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: MARC	Middle: ALLEN	Last: BANKES

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

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

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

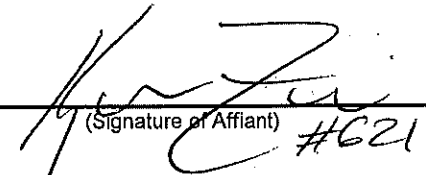
(Date)

AND NOW, on this date

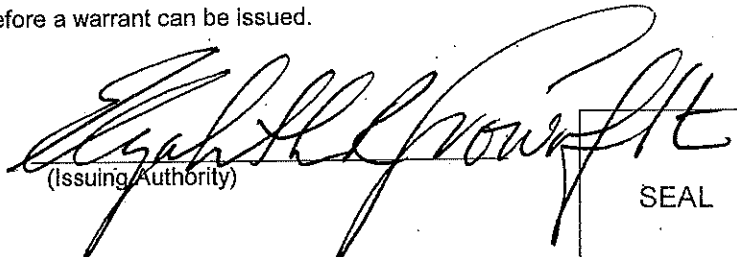
8/29/21

I certify that the complaint has been properly completed and verified.

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


 (Signature of Affiant) #621

41-3-05
 (Magisterial District Court Number)


 (Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: MARC	Middle: ALLEN	Last: BANKES

AFFIDAVIT of PROBABLE CAUSE

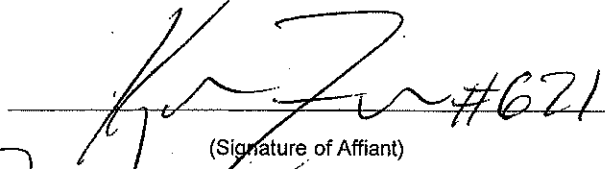
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

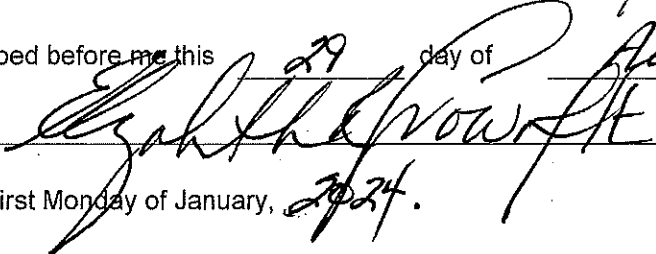
Your affiants requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

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

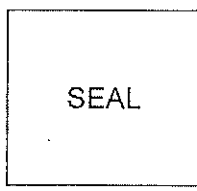
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.


(Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021

Date , Magisterial District Judge

My commission expires first Monday of January, 2024.



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: PERRY
 Magisterial District Number: 41-3-05
 MDJ: Hon. Elizabeth R. Frownfelter
 Address: 3553 Shermans Valley Road
 Loysville, PA 17047
 Telephone: (717)789-4117



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA

DEFENDANT:
DOUGLAS

VS.
 (NAME and ADDRESS):

FARNER
 First Name Middle Name Last Name
 104 Wayne Avenue
 Enola, PA 17025

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-420-21	Date Filed 8/29/21	OTN/LiveScan Number R168952-0	Complaint/Incident Number BN3200109XM	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 5/1/1977	POB	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 checked="" type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)
	<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"/> 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	584036MC4	MNU Number	235
Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO	Ft. HEIGHT In.	6 1
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 ROBERT SMULKTIŠ

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

08/22/2021

(Date)

I, AGENT KURT ZITSCH

(Name of the Affiant)

BNIDC - #621

(PSP/MPPOETC - 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 [214] Various Locations
 (Subdivision Code) (Place-Political Subdivision)

in PERRY County

[50]

(County Code)

on or about **JULY 23, 2020 TO MAY 19, 2021**



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: DOUGLAS	Middle:	Last: FARNER

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

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

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

<input checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry, Pennsylvania and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

<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	911	(B)(4)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry, Pennsylvania and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	---	---

<input type="checkbox"/>	3	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Douglas Farnier, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Marc Bankes, Nikolaus Andrews, Oksana Reed, Chelsey Andrews, Michael Rowello, Bradley Trump, Thomas Priar, Barry Melhorn, Scott Reabuck, and others; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: DOUGLAS	Middle:	Last: FARNER

<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"/>	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: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Douglas Farner, within Perry County, and elsewhere, did use a communication device, namely a cellular telephone, to arrange transactions of Methamphetamine and/or Heroin/Fentanyl and/or Marijuana between the time frame of April 7, 2021 and May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)

<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:

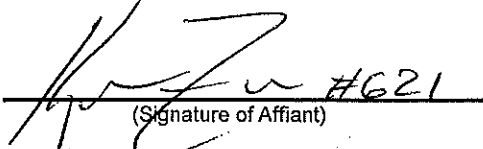


POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: DOUGLAS	Middle:	Last: FARNER

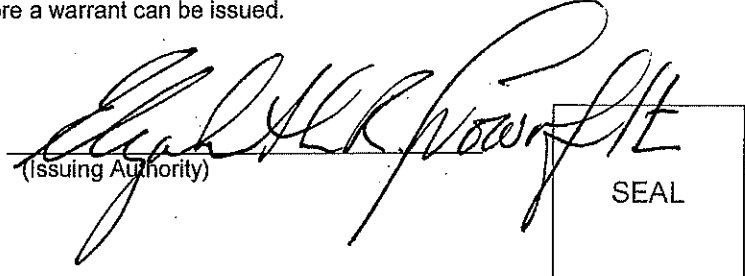
- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

_____ (Date) _____ (Year)  #621
 (Signature of Affiant)

AND NOW, on this date 8/29/21 I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

41-3-05
 (Magisterial District Court Number)


 (Issuing Authority) SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: DOUGLAS	Middle:	Last: FARNER

AFFIDAVIT of PROBABLE CAUSE

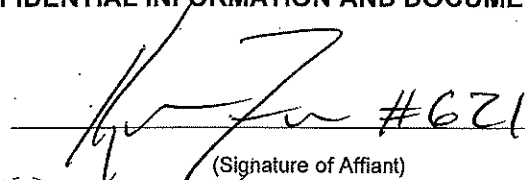
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

Your affiants requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

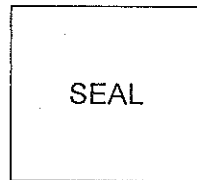
I, AGENT KURT ZITSCH, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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.

 #621
(Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021

Date Charles L. Nowak Magisterial District Judge
My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF PERRY
 Magisterial District Number: 41-3-05
 MDJ: Hon. Elizabeth R. Frownfelter
 Address: 3553 Shermans Valley Road
 Loysville, PA 17047
 Telephone: (717)789-4117



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
ROBERT WESLEY FOWLER
 First Name Middle Name Last Name

1660 S. Cameron Street
 Harrisburg, PA 17104

Ge
n

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CK-421-21	Date Filed 8/29/21	OTN/LiveScan Number R 168954-2	Complaint/Incident Number BN3200109XM 2	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 06/06/1982	POB	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 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 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 checked="" type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)
---	--	---	---

DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) 200
FBI Number 557269ND7	MNU Number	Ft. HEIGHT In. 5 11
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:	

DEFENDANT VEHICLE INFORMATION

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

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

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

SDAG ROBERT SMULKTIS (Name of the attorney for the Commonwealth) _____
 (Signature of the attorney for the Commonwealth) _____
 08/22/2021 (Date)

I, AGENT KURT ZITSCH (Name of the Affiant)	BNIDC - #621 (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. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above <input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [214] _____ (Subdivision Code) (Place-Political Subdivision)	
in PERRY County [50] _____ (County Code)	on or about JULY 23, 2020 TO MAY 19, 2021



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ROBERT	Middle: WESLEY	Last: FOWLER

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 checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry, Pennsylvania and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

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

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry, Pennsylvania and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30).

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	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Robert Fowler, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Anthony Leming, Marc Bankes, Nikolaus Andrews, Oksana Reed, Thomas Priar, Bradley Trump, Chelsey Andrews, Douglas Farner, Barry Melhorn, Michael Rowello, Scott Reabuck, and others; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30) methamphetamine and/or heroin/fentanyl and/or marijuana, and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ROBERT	Middle: WESLEY	Last: FOWLER

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"/> Lead?	4	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, within Harrisburg, Dauphin County, on or about July 23, 2020, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to a confidential information (CI) with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said 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"/> Lead?	5	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, within Millerstown, Perry County, on or about August 4, 2020, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to a confidential information (CI) with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said 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"/> Lead?	6	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, within Carlisle, Cumberland County, on or about January 15, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to Pennsylvania State Police Trooper Wes Johnson, with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said controlled substance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ROBERT	Middle: WESLEY	Last: FOWLER

<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"/> Lead?	7	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, within Carlisle, Cumberland County, on or about January 15, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: Fentanyl, to Pennsylvania State Police Trooper Wes Johnson, with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said 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"/> Lead?	8	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, within Mechanicsburg, Cumberland County, on or about February 9, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to Pennsylvania State Police Trooper Wes Johnson, with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said 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"/> Lead?	9	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, within Harrisburg, Dauphin County, on or about March 23, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to a confidential informant, with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said controlled substance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ROBERT	Middle: WESLEY	Last: FOWLER

<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"/>	10	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, in Tuscarora Township, Perry County, did knowingly possess with the intent to deliver controlled substances, namely, Methamphetamine, a Schedule II Controlled Substance, on or about April 3, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/>	11	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, in Tuscarora Township, Perry County, did knowingly possess with the intent to deliver controlled substances, namely, Fentanyl, a schedule II Controlled Substance, on or about April 3, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/>	12	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVER A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, in Ickesburg, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Methamphetamine, a schedule II Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: //	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ROBERT	Middle: WESLEY	Last: FOWLER

<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"/>	13	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, in Ickesburg, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Fentanyl, a schedule II Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/>	14	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, in Ickesburg, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Marijuana, a schedule I Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/>	15	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: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Robert Fowler, in Dauphin County, Cumberland County, Perry County, Montour County, and Columbia County, did use a communication device, namely a cellular telephone, to arrange transactions of Methamphetamine and/or Heroin/Fentanyl and/or Marijuana between the time frame of July 23, 2020 and May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ROBERT	Middle: WESLEY	Last: FOWLER

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

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

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

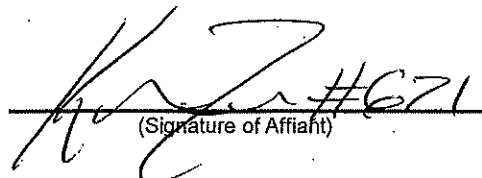
(Date)

AND NOW, on this date

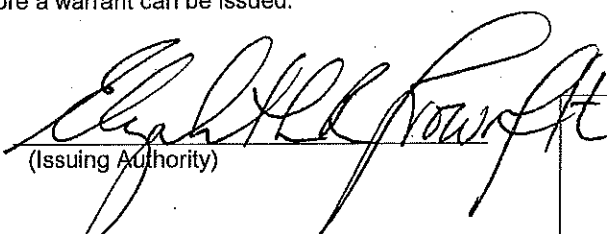
8/29/21

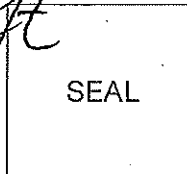
I certify that the complaint has been properly completed and verified.

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


(Signature of Affiant)

41-3-05
(Magisterial District Court Number)


(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: ROBERT	Middle: WESLEY	Last: FOWLER

AFFIDAVIT of PROBABLE CAUSE

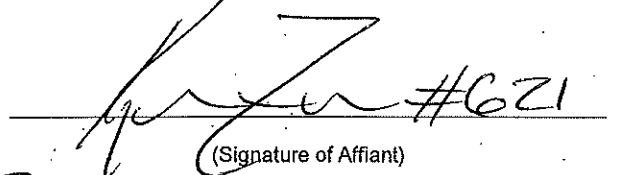
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

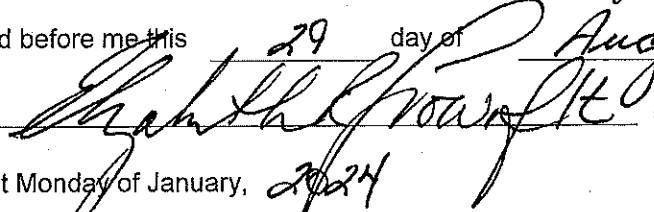
Your affiants requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

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

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

 #621
(Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021

Date , Magisterial District Judge

My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF PERRY
 Magisterial District Number: 41-3-05
 MDJ: Hon. Elizabeth R. Frownfelter
 Address: 3553 Shermans Valley Road
 Loysville, PA 17047
 Telephone: (717)789-4117



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
OKSANA ANDREEVA REED
 First Name Middle Name Last Name
 2296 Valley Road
 Manheim, PA 17545

Ge
n

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-423-21	Date Filed 8/29/21	OTN/LiveScan Number R 168957-5	Complaint/Incident Number BN3200109XM 4	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 05/16/1993	POB	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 <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 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.) 130
FBI Number 408081VD9	MNU Number			FL HEIGHT In. 5 0
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:			

DEFENDANT VEHICLE INFORMATION

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

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

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

SDAG ROBERT SMULKITIS (Name of the attorney for the Commonwealth) _____ (Signature of the attorney for the Commonwealth) _____ 08/22/2021 (Date)

I, AGENT KURT ZITSCH (Name of the Affiant) BNIDC - #621 (PSP/IMPOETC -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 [214] _____ Various Locations (Subdivision Code) (Place-Political Subdivision)
 in PERRY County [50] (County Code) on or about JULY 23, 2020 TO MAY 19, 2021



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: OKSANA	Middle: ANDREEVA	Last: REED

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 checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry, Pennsylvania and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

<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	911	(B)(4)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry, Pennsylvania and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	---	---

<input type="checkbox"/>	3	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Oksana Reed, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Marc Bankes, Nikolaus Andrews, Thomas Priar, Bradley Trump, Chelsey Andrews, Douglas Farner, Barry Melhorn, Scott Rowello, Michael Reabuck, and others; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: OKSANA	Middle: ANDREEVA	Last: REED

<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"/> Lead?	4	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **DELIVERY OF A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Oksana Reed, within Harrisburg, Dauphin County, on or about March 23, 2021, did, as a principal and/or accomplice, deliver a controlled substance, To Wit: METHAMPHETAMINE, to a Confidential Informant (CI), with said controlled substance being included in Schedule II of the PA Controlled Substance, Drug, Device and Cosmetic Act of 1972, with said defendant not being authorized or licensed by law to possess said 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"/> Lead?	5	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Oksana Reed, in Tuscarora Township, Perry County, did knowingly possess with the intent to deliver a controlled substances, namely, Methamphetamine, a Schedule II Controlled Substance, on or about April 3, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/> Lead?	6	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Oksana Reed, in Tuscarora Township, Perry County, did knowingly possess with the intent to deliver controlled substances, namely, Fentanyl, a Schedule II Controlled Substance, on or about April 3, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: OKSANA	Middle: ANDREEVA	Last: REED

<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"/> Lead?	7	7512	A	of the	TITLE 18	1	F3		
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: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Oksana Reed, in Perry County, Pennsylvania, and elsewhere, did use a communication device, namely a cellular telephone, to arrange transactions of Methamphetamine and/or Heroin/Fentanyl and/or Marijuana between the time frame of April 7, 2021 to May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)

<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"/> Lead?	8	3802	(d)(1)(ii)	of the	TITLE 75	1	M		
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): **DRIVING UNDER THE INFLUENCE OF A CONTROLLED SUBSTANCE**

Acts of the accused associated with this Offense: The Defendant, Oksana Reed, did drive, operate or was in actual physical control over the movement of a motor vehicle while there was in her blood any amount of a Schedule II Controlled Substance as defined in the Controlled Substance, Drug, Device and Cosmetic Act, which was not medically prescribed for her. To Wit: Oksana Reed's blood contained 430 nanograms per milliliter of methamphetamine, a Schedule II controlled substance, at that time Reed was the driver of a motor vehicle which crashed in Tuscarora Township, Perry County, 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"/> Lead?				of the					
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 BN3200109XM
Defendant Name:	First: OKSANA	Middle: ANDREEVA	Last: REED

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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

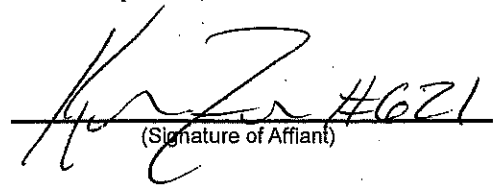
(Date)

AND NOW, on this date

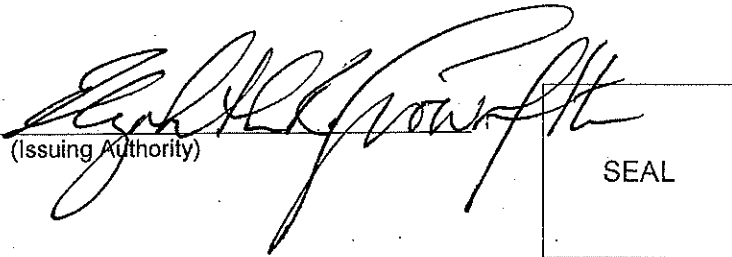
8/29/21

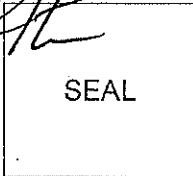
I certify that the complaint has been properly completed and verified.

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


 (Signature of Affiant)

41-3-05
 (Magisterial District Court Number)


 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: OKSANA	Middle: ANDREEVA	Last: REED

AFFIDAVIT of PROBABLE CAUSE

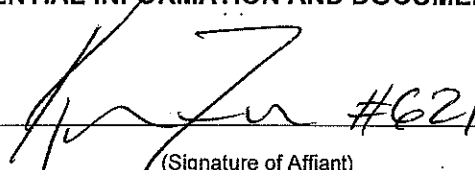
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

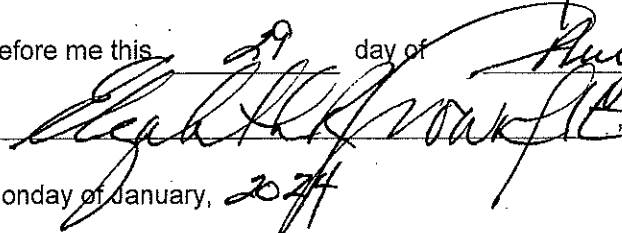
Your affiants requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

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

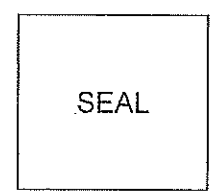
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

 #621
(Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021

Date 29 August 2021  Magisterial District Judge

My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PERRY

Magisterial District Number: 41-3-05
MDJ: Hon. Elizabeth R. Frownfelter
Address: 3553 Shermans Valley Road
Loysville, PA 17047

Telephone: (717)789-4117



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

SCOTT

WAYNE

REABUCK

First Name

Middle Name

Last Name

Ge
n

82 Lover Drive
Bloomsburg, PA 17815

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-424-21	Date Filed 8/29/21	OTN/LiveScan Number R168958-6	Complaint/Incident Number BN3200109XM 5	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 8/18/1966	POB	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"/> Aslan <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)
Eye Color <input checked="" type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) 160		
FBI Number 761477EB2	MNU Number	Ft. HEIGHT In. 5 6		
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:			

DEFENDANT VEHICLE INFORMATION

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

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

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

SDAG ROBERT SMULKTIŠ

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

08/22/2021

(Date)

I, AGENT KURT ZITSCH

BNIDC - #621

(Name of the Affiant)

(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 [214] _____ Various Locations
(Subdivision Code) (Place-Political Subdivision)

in PERRY County

[50]

(County Code)

on or about JULY 23, 2020 TO MAY 19, 2021



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: SCOTT	Middle: WAYNE	Last: REABUCK

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

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

<input checked="" type="checkbox"/> Lead?	1	911	(B)(3)	of the	TITLE 18	1	F1	NCIC Offense Code	UCR/NIBRS Code
---	---	-----	--------	--------	----------	---	----	-------------------	----------------

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

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

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

<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"/> Lead?	2	911	(B)(4)	of the	TITLE 18	1	F1	NCIC Offense Code	UCR/NIBRS Code
--------------------------------	---	-----	--------	--------	----------	---	----	-------------------	----------------

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

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

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	---	---

<input type="checkbox"/> Lead?	3	780-113	(A)(30)	of the	TITLE 35	1	F	NCIC Offense Code	UCR/NIBRS Code
--------------------------------	---	---------	---------	--------	----------	---	---	-------------------	----------------

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

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Scott Reabuck, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Marc Bankes, Nikolaus Andrews, Oksana Reed, Chelsey Andrews, Thomas Priar, Bradley Trump, Douglas Farmer, Barry Melhorn, Michael Rowello, and others,; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: SCOTT	Middle: WAYNE	Last: REABUCK

<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"/> Lead?	4	780-113	(A)(30)	of the	TITLE 35	1	F		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Statute Description (include the name of statute or ordinance): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Scott Reabuck, in Bloomsburg, Columbia County, did knowingly possess with the intent to deliver a controlled substance, namely, Methamphetamine, a Schedule II Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/> Lead?	5	780-113	(A)(30)	of the	TITLE 35	1	F		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Statute Description (include the name of statute or ordinance): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Scott Reabuck, in Bloomsburg, Columbia County, did knowingly possess with the intent to deliver a controlled substance, namely, FENTANYL, a Schedule II Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/> Lead?	6	7512	A	of the	TITLE 18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Statute Description (include the name of statute or ordinance): **CRIMINAL US OF A COMMUNICATION FACILITY: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Scott Reabuck, within Columbia County, and elsewhere, did use a communication device, namely a cellular telephone, to arrange transactions of Controlled Substances (Methamphetamine and/or Heroin/Fentanyl, and/or Marijuana) between the time frame of April 7, 2021 and May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: SCOTT	Middle: WAYNE	Last: REABUCK

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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

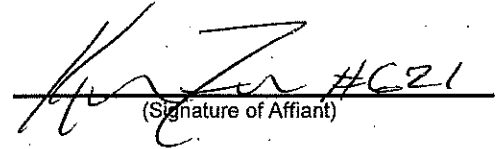
(Date)

AND NOW, on this date

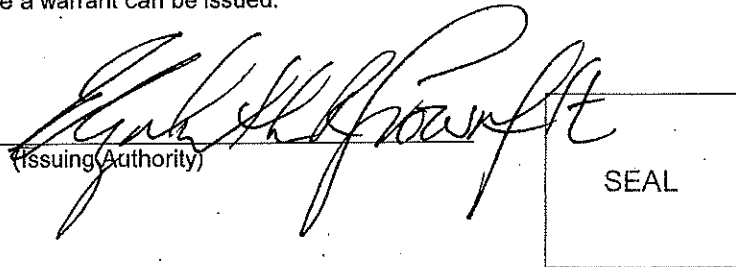
8/29/21

I certify that the complaint has been properly completed and verified.

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


 (Signature of Affiant)

41-3-05
 (Magisterial District Court Number)


 (Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: SCOTT	Middle: WAYNE	Last: REABUCK

AFFIDAVIT of PROBABLE CAUSE

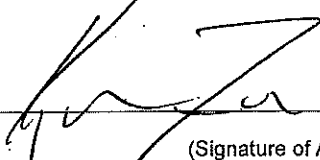
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.


Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

Your affiants requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

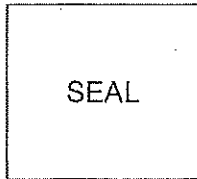
I, AGENT KURT ZITSCH, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

 #621
(Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021
Date , Magisterial District Judge

My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: PERRY
 Magisterial District Number: 41-3-05
 MDJ: Hon. Elizabeth R. Frownfelter
 Address: 3553 Shermans Valley Road
 Loysville, PA 17047
 Telephone: (717)789-4117



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
THOMAS DANIEL PRIAR III
 First Name Middle Name Last Name
 189 Bedford Trail
 Ickesburg, PA 17037

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-425-21	Date Filed 8/29/21	OTN/LiveScan Number R168959-0	Complaint/Incident Number BN3200109XM 6	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 7/11/1985	POB	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"/> Hispanic	<input type="checkbox"/> Asian	<input type="checkbox"/> Black	<input type="checkbox"/> Native American	<input type="checkbox"/> Unknown
ETHNICITY <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input checked="" type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green)
Hair Color	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> PNK (Pink)
Eye Color <input checked="" type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)
	<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 290521AD5	MNU Number			195
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"/>	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 ROBERT SMULKITIS (Name of the attorney for the Commonwealth) _____ (Signature of the attorney for the Commonwealth)
 08/22/2021 (Date)

I, **AGENT KURT ZITSCH** (Name of the Affiant) **BNIDC - #621** (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 [214] _____ Various Locations (Subdivision Code) (Place-Political Subdivision)
 in PERRY County [50] _____ on or about JULY 23, 2020 TO MAY 19, 2021 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: THOMAS	Middle: DANIEL	Last: PRIAR III

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

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

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

<input checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry, Pennsylvania and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

<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	911	(B)(4)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry, Pennsylvania and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	--	---

<input type="checkbox"/>	3	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Thomas Priar, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Marc Bankes, Nikolaus Andrews, Oksana Reed, Chelsey Andrews, Michael Rowello, Bradley Trump, Douglas Farner, Barry Melhorn, Scott Reabuck, and others; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: THOMAS	Middle: DANIEL	Last: PRIAR III

<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"/>	4	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Thomas Priar, in Ickesburg, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Fentanyl, a Schedule II Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/>	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: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Thomas Priar, within Perry County, and elsewhere, did use a communication device, namely a cellular telephone, to arrange transactions of Methamphetamine and/or Heroin/Fentanyl and/or Marijuana between the time frame of April 7, 2021 and May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)

<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

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: THOMAS	Middle: DANIEL	Last: PRIAR III

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

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

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

(Date)

[Signature] #621
(Signature of Affiant)

AND NOW, on this date 8/29/21 I certify that the complaint has been properly completed and verified.

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

41-3-05
(Magisterial District Court Number)

[Signature]
(Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: THOMAS	Middle: DANIEL	Last: PRIAR III

AFFIDAVIT of PROBABLE CAUSE

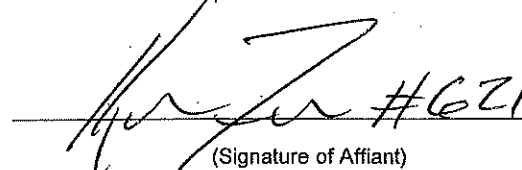
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

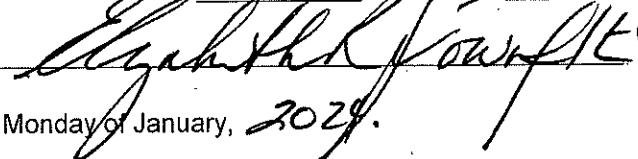
Your affiants requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

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

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

 #621
(Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021

Date  Magisterial District Judge
My commission expires first Monday of January, 2022.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PERRY



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

Magisterial District Number: 41-3-05
MDJ: Hon. Elizabeth R. Frownfelter
Address: 3553 Shermans Valley Road
Loysville, PA 17047

DEFENDANT: (NAME and ADDRESS):
NIKOLAUS JOHN Andrews
First Name Middle Name Last Name

17 Beechwood Drive
Middletown, PA 17057

Telephone: (717)789-4117

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-422-21	Date Filed 8/29/21	OTN/LiveScan Number R 168955-3	Complaint/Incident Number BN3200109XM 3	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 12/11/1979	POB	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 <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 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.) 260
FBI Number 501849MB3	MNU Number	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		Ft. HEIGHT In. 5 10
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 ROBERT SMULKTIŠ _____ 08/22/2021
(Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, AGENT KURT ZITSCH (Name of the Affiant)	BNIDC - #621 (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. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above <input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [214] _____ Various Locations (Subdivision Code) (Place-Political Subdivision)	
in PERRY County [50] _____ (County Code)	on or about JULY 23, 2020 TO MAY 19, 2021



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: NIKOLAUS	Middle: JOHN	Last: Andrews

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 checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances(methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act. 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

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

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act. 35 P.S. § 780-113(a) (30).

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	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Nikolaus Andrews, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Marc Banks, Michael Rowello, Oksana Reed, Chelsey Andrews, Thomas Priar, Bradley Trump, Douglas Farnar, Barry Melhorn, Scott Reabuck, and others,; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: NIKOLAUS	Middle: JOHN	Last: Andrews

<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"/>	4	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Nikolaus Andrews, in Middletown, Dauphin County, did knowingly possess with the intent to deliver a controlled substance, namely, Marijuana & THC, a Schedule I Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/>	5	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Nikolaus Andrews, in Middletown, Dauphin County, did knowingly possess with the intent to deliver a controlled substance, namely, PSILOCYBIN, a Schedule I Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/>	6	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: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Nikolaus Andrews, within Dauphin County, and elsewhere, did use a communication device, namely a cellular telephone, to arrange transactions of Marijuana & THC between the time frame of April 7, 2021 and May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)



POLICE CRIMINAL COMPLAINT

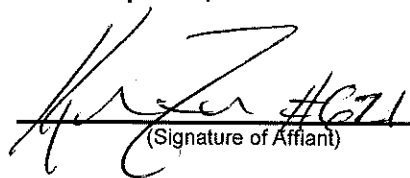
Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: NIKOLAUS	Middle: JOHN	Last: Andrews

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

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

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

(Date)

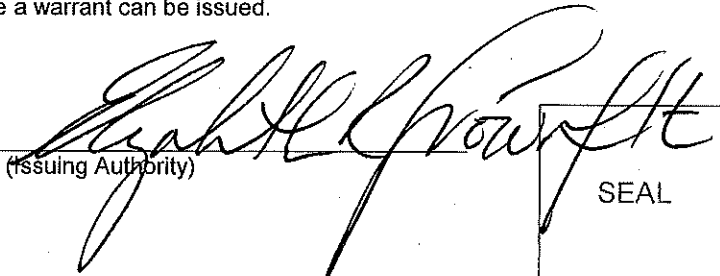


(Signature of Affiant)

AND NOW, on this date 8/29/21 I certify that the complaint has been properly completed and verified.

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

41-3-05
(Magisterial District Court Number)



(Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: NIKOLAUS	Middle: JOHN	Last: Andrews

AFFIDAVIT of PROBABLE CAUSE


Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

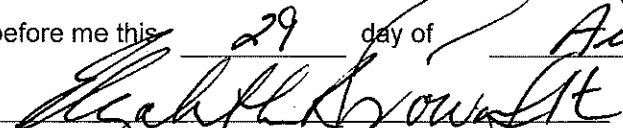
Your affiant requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

I, AGENT KURT ZITSCH, 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.

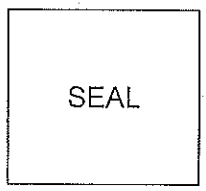
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



 (Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021
 _____ Date  Magisterial District Judge

My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF PERRY
 Magisterial District Number: 41-3-05
 MDJ: Hon. Elizabeth R. Frownfelter
 Address: 3553 Shermans Valley Road
 Loysville, PA 17047
 Telephone: (717)789-4117



**POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA**

DEFENDANT:
BARRY
 First Name

VS.
 (NAME and ADDRESS):
MELHORN
 Middle Name Last Name

302 W. Juniata Parkway
 Millerstown, PA 17062

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-426-21	Date Filed 8/29/21	OTN/LiveScan Number R.168960-1	Complaint/Incident Number BN3200109XM 7	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 11/02/1962	POB	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"/> Aslan <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> 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.) 150		
FBI Number 591266JA0	MNU Number	Ft. HEIGHT In. 5 9		
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:			

DEFENDANT VEHICLE INFORMATION

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

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

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

SDAG ROBERT SMULKTIS

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

08/22/2021

(Date)

I, **AGENT KURT ZITSCH**

BNIDC - #621

(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 [214] Various Locations
 (Subdivision Code) (Place-Political Subdivision)

in PERRY County

[50]

(County Code)

on or about **JULY 23, 2020 TO MAY 19, 2021**



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BARRY	Middle:	Last: MELHORN

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

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

<input checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry, Pennsylvania and elsewhere, while employed or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

<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	911	(B)(4)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry, Pennsylvania and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	---	---

<input type="checkbox"/>	3	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Barry Melhorn, with the Intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Mark Bankes, Nikolaus Andrews, Oksana Reed, Chelsey Andrews, Thomas Priar, Bradley Trump, Douglas Farner, Michael Rowello, Scott Reabuck, and others; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BARRY	Middle:	Last: MELHORN

<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"/>	4	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Barry Melhorn, in Millerstown, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Methamphetamine, a Schedule II Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/>	5	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Barry Melhorn, in Millerstown, Perry County, did knowingly possess with the intent to deliver a controlled substance, namely, Marijuana, a Schedule I Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BARRY	Middle:	Last: MELHORN

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

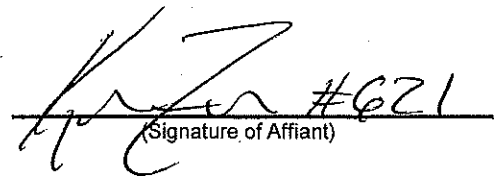
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

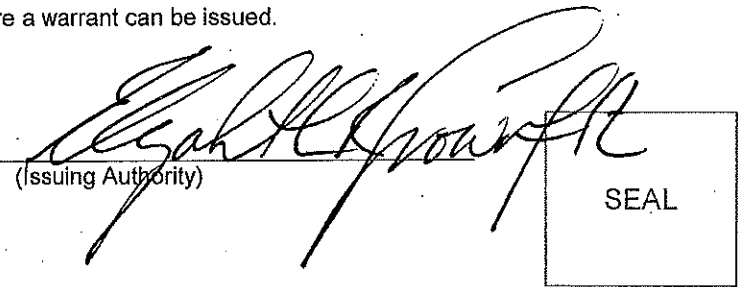
AND NOW, on this date 8/29/21

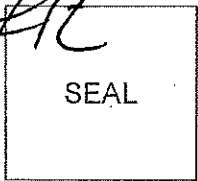
I certify that the complaint has been properly completed and verified.

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

 #621
 (Signature of Affiant)

41-3-05
 (Magisterial District Court Number)


 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: BARRY	Middle:	Last: MELHORN

AFFIDAVIT of PROBABLE CAUSE

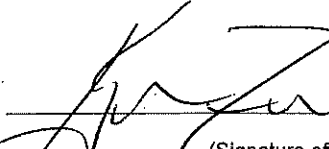
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

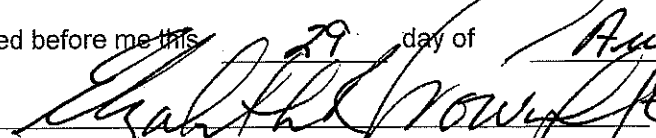
Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

Your affiants requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

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

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

 #621
(Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021
Date  Magisterial District Judge

My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: PERRY



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 41-3-05
MDJ: Hon. Elizabeth R. Frownfelter
Address: 3553 Shermans Valley Road
Loysville, PA 17047

DEFENDANT:

(NAME and ADDRESS):

MICHAEL

THOMAS

ROWELLO

First Name

Middle Name

Last Name

Telephone: (717)789-4117

445 Spring Street
Danville, PA 17821

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-427-21	Date Filed 8/29/21	OTN/LiveScan Number R168962-3	Complaint/Incident Number BN3200109XM 8	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 10/17/1976	POB	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 checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> BLN (Blonde / Strawberry)	Eye Color <input checked="" type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <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 type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)
---	--	--	--	---	---	---	---

DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) 235
FBI Number 774941FD2	MNU Number	Ft. HEIGHT In. 5 11
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		

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 ROBERT SMULKTIŠ

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

08/22/2021

(Date)

I, AGENT KURT ZITSCH

(Name of the Affiant)

BNIDC - #621

(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 [214] Various Locations
(Subdivision Code) (Place-Political Subdivision)

in PERRY County

[50]

(County Code)

on or about JULY 23, 2020 TO MAY 19, 2021



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: MICHAEL	Middle: THOMAS	Last: ROWELLO

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

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

<input checked="" type="checkbox"/>	1	911	(B)(3)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, conduct or participate, directly or indirectly, while being employed by or associated with an enterprise, in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein, within the County of Perry and elsewhere, while employed by or associated with an enterprise engaged in the possession of controlled substances (methamphetamine and/or heroin/fentanyl and/or marijuana) with the intent to distribute, did conduct or participate directly or indirectly in the affairs of said enterprise 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). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.

<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	911	(B)(4)	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant did, within the County of Perry and elsewhere, conspire to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. § 911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. § 911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. § 911(b)(4). The pattern of racketeering consists of multiple acts of violation of the Controlled Substance, Drug, Device and Cosmetic Act, 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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	--	---

<input type="checkbox"/>	3	780-113	(A)(30)	of the	TITLE 35	1	F		
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 TO COMMIT VIOLATIONS OF THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT, SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: Between July 23, 2020, and May 19, 2021, the Defendant, Michael Rowello, with the intent of promoting or facilitating the commission of a crime, 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 did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, at various locations in Perry County, Pennsylvania and elsewhere, Defendant did agree with Robert Fowler, Anthony Leming, Marc Bankes, Nikolaus Andrews, Oksana Reed, Chelsey Andrews, Thomas Priar, Bradley Trump, Douglas Farmer, Barry Melhorn, Scott Reabuck, and others; that they, or one or more of them, would engage in conduct constituting multiple violations of the Controlled Substance Drug, Device and Cosmetic Act, 35 P.S. § 780-113(a) (30)(methamphetamine and/or heroin/fentanyl and/or marijuana), and in pursuance of such conspiracy one or more overt acts were committed.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: MICHAEL	Middle: THOMAS	Last: ROWELLO

<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"/> Lead?	4	780-113	(A)(30)	of the	TITLE 35	1	F		
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): **PROHIBITED ACTS: POSSESSION WITH INTENT TO DELIVERY A CONTROLLED SUBSTANCE: SECTION 780-113 (A)(30) OF ACT 64 (THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT)**

Acts of the accused associated with this Offense: The defendant, Michael Rowello, in Danville, Montour County, did knowingly possess with the intent to deliver a controlled substance, namely, Methamphetamine, a Schedule II Controlled Substance, on or about May 19, 2021. The said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Acto of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board.

<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"/> Lead?	5	7512	A	of the	TITLE 18	1	F3		
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: SECTION 7512 (A) OF TITLE 18, PA CRIMES CODE**

Acts of the accused associated with this Offense: The defendant, Michael Rowello, within Montour County, and elsewhere, did use a communication device; namely a cellular telephone, to arrange transactions of Methamphetamine between the time frame of April 7, 2021 and May 19, 2021, which is a Felony graded crime in violation of Section 7512 (A) of the Pennsylvania Crimes Code, as amended, 18 Pa.C.S. 7512 (A)

<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"/> Lead?				of the					
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:



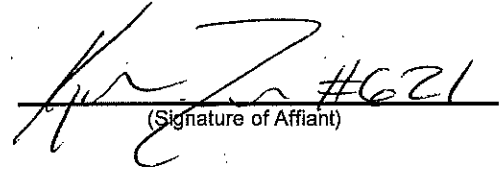
POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: MICHAEL	Middle: THOMAS	Last: ROWELLO

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

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

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



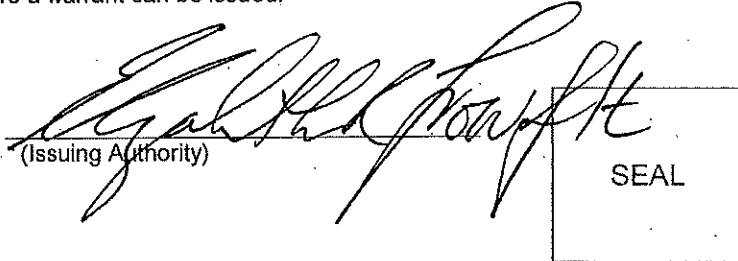
(Signature of Affiant)

(Date)

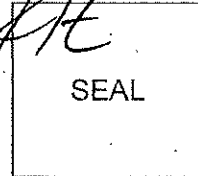
AND NOW, on this date 8/29/21 I certify that the complaint has been properly completed and verified.

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

41-3-05
(Magisterial District Court Number)



(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First: MICHAEL	Middle: THOMAS	Last: ROWELLO

AFFIDAVIT of PROBABLE CAUSE

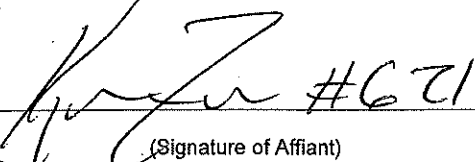
Your Affiant, Kurt Zitsch, is a narcotics agent employed by the Pennsylvania Office of Attorney General. I have been employed by the Pennsylvania Office of Attorney General since March 2016. I am currently assigned to the Region III Bureau of Narcotics Investigation and Drug Control Harrisburg Office.

Your affiant has been involved in the investigation presented to the 47th Statewide Investigative Grand Jury, which is outlined in the attached Grand Jury Presentment. The attached Grand Jury Presentment is incorporated as the affidavit of probable cause.

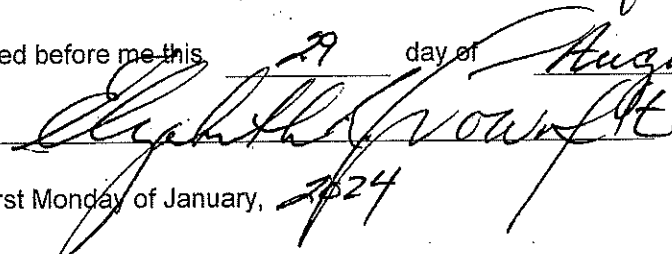
Your affiant requests a 72 hour delay for the release of the warrants due to the nature of the investigation (Grand Jury) and to permit the service of this warrant.

I, AGENT KURT ZITSCH, 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.

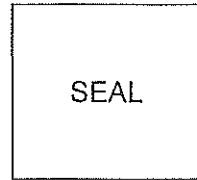
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

 #671
(Signature of Affiant)

Sworn to me and subscribed before me this 29 day of August 2021

Date  Magisterial District Judge

My commission expires first Monday of January, 2024



INTRODUCTION

We, the members of the Forty-Seventh Statewide Investigating Grand Jury, having received evidence pertaining to violations of the Controlled Substance, Drug, Device and Cosmetic Act and the Pennsylvania Crimes Code occurring in and around Dauphin, Cumberland, Perry, Columbia, Luzerne, Northampton and Montour Counties, Pennsylvania, pursuant to Notice of Submission of Investigation No. 24, do hereby make the following findings of fact and recommendation of charges:

SUMMARY

In July 2020, the Pennsylvania Office of Attorney General ("OAG") began an investigation into a drug trafficking organization distributing methamphetamine,¹ heroin,² heroin laced with fentanyl³ and marijuana⁴ in and around Dauphin, Cumberland and Perry Counties. The investigation revealed that the leader of this organization, Robert Wesley Fowler ("Fowler"), obtained quantities of methamphetamine and heroin/fentanyl from sources in Columbia and Luzerne Counties and quantities of marijuana from a source in Dauphin County. Fowler's girlfriend, Oksana Reed ("Reed"), would often assist him in obtaining and transporting the controlled substances.

Over the course of the next year, a variety of investigative techniques were employed in order to identify all of the members of Fowler's drug trafficking organization and their roles within the organization. Investigators utilized the resources of the Grand Jury in order to issue subpoenas

¹ Methamphetamine is a Schedule II controlled substance.

² Heroin is a Schedule I controlled substance.

³ Fentanyl is a Schedule II controlled substance.

⁴ Marijuana is a Schedule I controlled substance.

for records and executed search warrants at various locations. Investigators also conducted physical and video surveillance, utilized confidential informants to conduct controlled purchases, installed GPS tracking devices and obtained pen registers. The investigation ultimately culminated in the use of non-consensual wiretaps to determine the scope of the organization. These investigative methods revealed that Fowler had multiple sources for controlled substances, including: Marc Bankes, Anthony Leming and Nikolaus Andrews. Investigators were also able to listen as Fowler made telephone calls to arrange for others to re-distribute controlled substances. Through a combination of calls, surveillance, controlled purchases and search warrants, investigators determined that the following individuals were re-distributing the controlled substances that they obtained from Fowler: Bradley Trump, Michael Rowello, Scott Reabuck, Douglas Farner, Chelsey Andrews, Thomas Priar and Barry Melhorn. These suppliers and re-distributors, along with Fowler and Reed, conspired to continue the ongoing distribution of controlled substances until May 2021 when the organization was ultimately dismantled by law enforcement.

FINDINGS OF FACT

In July 2020, agents with the OAG Bureau of Narcotics Investigations and Drug Control met with a Confidential Informant ("CI") who stated that he/she had information pertaining to "Bob Fowler" who was selling quantities of methamphetamine in Dauphin, Cumberland and Perry Counties. The CI provided first-hand knowledge of the manner in which Fowler distributed controlled substances and expressed an ability to purchase methamphetamine from him. The CI was shown a photograph of Fowler and confirmed this was the person he/she knew as "Bob Fowler." Agents then decided to utilize the CI to conduct a controlled purchase of methamphetamine from Fowler.

The Grand Jury learned that a controlled purchase is a method used to buy illegal drugs through the use of a CI who is under the "control" of law enforcement. There are several steps involved in connection with a controlled purchase. First, the CI is searched before and after the controlled purchase to ensure he/she has no money or drugs on his/her person. If a vehicle is used, it is searched before and after the controlled purchase to confirm that there are no money or drugs inside of it. Next, the CI is given pre-recorded money in order to purchase the drugs. The CI is then taken or followed by law enforcement to the location of the drug purchase. After the purchase, the CI returns to law enforcement and is taken to a de-briefing location where the purchased drugs are surrendered. The CI often provides a statement as to what took place during the transaction. This process was followed in connection with all of the controlled purchases outlined in this Presentment.

On July 23, 2020, the CI made arrangements with Fowler via cellular telephone to purchase a quantity of methamphetamine from him. Fowler directed the CI to come to his residence located at 1660 South Cameron Street in Harrisburg, Dauphin County. The CI was transported to this location by Narcotics Agent Dawn Matson ("NA Matson") and provided with a video recording device with which to record the transaction. NA Matson observed the CI walk to the rear of the residence and return approximately two minutes later with a quantity of methamphetamine which the CI turned over to her. During the course of a de-briefing with Narcotics Agent Kurt Zitsch ("NA Zitsch"), the CI advised that he/she obtained the quantity of methamphetamine from Fowler in exchange for pre-recorded buy funds. NA Zitsch reviewed the video recording of the controlled purchase and confirmed that Fowler delivered the methamphetamine to the CI. The methamphetamine was sent to the Pennsylvania State Police Crime Laboratory ("PSP

Laboratory") for analysis. The results revealed the presence of approximately 10.92 grams of methamphetamine.

On August 4, 2020, the CI contacted Fowler via cellular telephone and arranged to purchase a quantity of controlled substances. Fowler directed the CI to meet him at a service station near 302 West Juniata Parkway in Millerstown, Perry County. NA Matson transported the CI to this location. Surveillance agents were able to observe the CI meet with Fowler and engage in a hand-to-hand transaction wherein Fowler provided the CI with controlled substances in exchange for pre-recorded currency. Following the transaction, the CI returned to NA Matson's vehicle and turned over a quantity of methamphetamine. Results from the PSP Laboratory confirmed the presence of approximately 27.86 grams of methamphetamine.

The Grand Jury heard testimony that in January 2021, NA Zitsch was contacted by PSP Trooper Wes Johnson ("Trooper Johnson") who was conducting an investigation into the activities of Chelsey Andrews ("Andrews"). Trooper Johnson advised that he had been acting in an undercover capacity to purchase controlled substances from Andrews and was aware that she was going to Fowler to obtain these controlled substances.

On January 15, 2021, with Trooper Johnson acting in an undercover capacity, OAG agents conducted a controlled purchase from Andrews. Trooper Johnson contacted Andrews via cellular telephone and made arrangements to purchase quantities of methamphetamine and heroin. Andrews provided a price for the controlled substances, but indicated that she had to contact "Bobby" first to see if he was available. Andrews subsequently contacted Trooper Johnson and informed him that he would have to pick her up and transport her to "Bobby," who was currently at the Residence Inn located at One Hampton Court in Carlisle, Cumberland County.

Narcotics Agent Sean Haggarty was conducting surveillance at that time and observed Fowler exit the Residence Inn and enter his white Jeep Cherokee on several occasions. While en route to the meeting location, Andrews informed Trooper Johnson that they were going to Room 308 to meet with "Bobby." Andrews also discussed parts of Fowler's drug trafficking operation and prices for larger quantities of controlled substances. When Trooper Johnson and Andrews arrived at the Residence Inn, Andrews went inside. After several minutes, she returned to Trooper Johnson's vehicle and provided him with a quantity of methamphetamine and suspected heroin. The suspected heroin bags were stamped "Contact High" and "Light's Out."

Results from the PSP Laboratory revealed the presence of approximately 13.98 grams of methamphetamine. The substance in the "Contact High" bags tested positive for fentanyl and weighed approximately .15 grams. The substance in the "Light's Out" bags also tested positive for fentanyl and weighed approximately .47 grams.

On February 9, 2021, another controlled purchase from Andrews was conducted with Trooper Johnson acting in an undercover capacity. Trooper Johnson contacted Andrews via cellular telephone to determine the price for one quarter-pound of methamphetamine. Andrews advised that "Bobby" charged \$2,400.00 for one quarter-pound. During a subsequent call, Andrews confirmed that the controlled purchase would happen that day and directed Trooper Johnson to meet her at Room 206 of the Fairfield Inn located in Mechaniosburg, Cumberland County.

After Trooper Johnson arrived at the hotel, the controlled purchase of methamphetamine occurred in Room 206. After the purchase, Trooper Johnson informed agents that he met with Andrews and Fowler in the hotel room. There, Fowler pulled out a bag containing methamphetamine and weighed out one quarter-pound. Trooper Johnson counted out \$2,400.00 in front of Andrews and Fowler before providing the money to Andrews. Andrews re-counted the

cash before providing it to Fowler. Fowler then handed the drugs to Trooper Johnson. Trooper Johnson advised that he attempted to obtain Fowler's telephone number in order to contact him directly to obtain additional quantities of controlled substances. Fowler initially made unrealistic demands, including requiring Trooper Johnson to supply Fowler with cocaine and provide a copy of his personal identification in order for Fowler to deal with him directly. Subsequently, however, Fowler directed Trooper Johnson to contact Andrews for any future purchases. Results from the PSP Laboratory confirmed that the substance that Trooper Johnson purchased was methamphetamine and weighed approximately 111.85 grams.

On March 23, 2021, agents met with "CI2," who conducted a controlled purchase of a quantity of methamphetamine from Fowler. CI2 and Fowler made arrangements via cellular telephone to meet in the area of 150 Nationwide Drive in Harrisburg, Dauphin County to complete the purchase. Supervisory Narcotics Agent Tom Moore observed the ~~CI~~ ^{CI2} meet with Fowler in the parking lot of that location. Fowler was the passenger in a Chrysler minivan which was also occupied by Fowler's girlfriend, Reed. Reed was observed entering a hotel at that location, with CI2 following her shortly thereafter. Approximately three minutes later, CI2 returned to the minivan. After a few additional minutes, Reed returned to the minivan where, according to CI2, the controlled purchase was completed. CI2, Reed, Fowler and two additional unknown males then entered the hotel with CI2 exiting a few minutes later. During a de-briefing, CI2 informed NA Zitsch that he/she initially provided Fowler with the pre-recorded funds to purchase the methamphetamine. Fowler directed Reed to obtain the methamphetamine from the hotel room and, when she returned to the vehicle, she provided the methamphetamine to CI2. Results from the PSP Laboratory revealed that the substance purchased was approximately .93 grams of methamphetamine.

The Grand Jury heard testimony that OAG agents also conducted controlled purchases from Bradley Trump ("Trump"), one of Fowler's co-conspirators. Agents received information from "CI3" that Trump was distributing quantities of methamphetamine, heroin and marijuana in Perry County.

On January 14, 2021, agents met with CI3 for the purpose of conducting a controlled purchase of methamphetamine from Trump. CI3 showed agents a text message conversation between CI3 and Trump from the previous day where they made arrangements for the distribution of methamphetamine. Agents also requested that CI3 attempt to purchase heroin from Trump at the same time. Narcotics Agent Chris Burnell ("NA Burnell") then transported CI3 to 88 Rock Hollow Road in Elliottsburg, Perry County. NA Burnell observed CI3 enter the residence and then exit several minutes later. Upon returning to NA Burnell's vehicle, CI3 turned over a quantity of methamphetamine and a quantity of suspected heroin. The bag of suspected heroin was stamped "Contact High."

During a de-briefing, CI3 advised that Trump was the only person in the residence and that he directed CI3 to obtain the controlled substances from a cookie jar. CI3 then provided Trump with pre-recorded currency in exchange for the controlled substances. Testing by the PSP Laboratory confirmed the presence of approximately 27.83 grams of methamphetamine. Testing also revealed that the bag stamped "Contact High" contained approximately .009 grams of fentanyl.

On January 22, 2021, another controlled purchase was made from Trump. On that occasion, NA Burnell transported CI3 to 88 Rock Hollow Road and observed CI3 enter the residence. Several minutes later, CI3 returned to the vehicle and turned over a quantity of methamphetamine and suspected heroin. The suspected heroin was in a bag stamped "Light's

Out." During a de-briefing, CI3 again stated that Trump was the only person in the residence and that he directed CI3 to obtain the controlled substances from a toolbox next to his bed. Testing by the PSP Laboratory confirmed that presence of approximately 27.71 grams of methamphetamine. Testing also revealed that the bag stamped "Light's Out" contained approximately .006 grams of fentanyl.

On February 3, 2021, a third controlled purchase was made from Trump. CI3 showed agents a text message exchange between Trump and CI3 arranging the transaction. NA Burnell transported CI3 to 88 Rock Hollow Road and observed CI3 enter the residence. After several minutes, CI3 exited the residence and returned to NA Burnell's vehicle with methamphetamine and pressed fentanyl pills. During a de-briefing of CI3, he/she advised that Trump obtained the methamphetamine from a toolbox next to his bed. Trump told CI3 that he did not have any heroin, but provided CI3 with pressed fentanyl pills instead. The PSP Laboratory confirmed that the substances were methamphetamine and fentanyl. The methamphetamine weighed approximately 27.78 grams and the fentanyl pills weighed approximately .21 grams.

On February 4, 2021, agents executed a search warrant at 88 Rock Hollow Road. Trump was inside the residence at that time with a clear, plastic bag of methamphetamine on his lap. Agents also located additional quantities of methamphetamine, multiple firearms, marijuana, drug paraphernalia and a large amount of United States currency inside the residence. Testing by the PSP Laboratory confirmed that agents recovered a total of approximately 280.77 grams of methamphetamine. A vacuum sealed bag of marijuana containing 13 separate individually packaged one ounce bags of marijuana tested positive for marijuana and weighed approximately 376 grams. NA Zitsch informed the Grand Jury that the manner in which this marijuana was packaged was indicative of someone re-selling the marijuana. Additional smaller quantities of

marijuana, consistent with personal use, were located throughout the residence. Marijuana wax and THC⁵ cartridges were also located inside the residence. The THC wax was tested by the PSP Laboratory and confirmed to contain approximately 62.55 grams of THC. Glass smoking devices, a marijuana grinder, two digital scales and packaging material constituted the drug paraphernalia located in the residence. The total amount of currency seized amounted to \$17,298.00.

Following the execution of the search warrant, Trump was advised of his Miranda rights and agreed to speak with OAG agents. Trump admitted to selling quantities of methamphetamine, heroin/fentanyl and marijuana from his residence. He named Fowler as his source of supply for methamphetamine and heroin/fentanyl. According to Trump, he would obtain one pound quantities of methamphetamine from Fowler on a weekly basis. Trump stated he purchased "brick" quantities of heroin/fentanyl (five bundles totaling fifty bags) from Fowler on a weekly basis. Trump stated that two of the firearms located inside the residence belonged to Fowler. He explained that Fowler was storing them at Trump's residence because Fowler was prohibited from possessing a firearm.

During the course of the investigation, Fowler's girlfriend, Reed, was identified as one of his co-conspirators in the drug trafficking organization. Reed would often transport Fowler to obtain additional quantities of controlled substances for distribution. On April 3, 2021, PSP troopers responded to a crash in the area of 3184 Raccoon Valley Road in Tuscarora Township, Perry County. Reed's Chrysler minivan had crossed over the intersection, went over an embankment and hit a culvert. Fowler was a passenger in the vehicle at the time of the accident. When the troopers arrived, Reed was in an ambulance. She stated that she was driving the vehicle, but did not remember the crash. She stated that she only remembered turning to Fowler to indicate

⁵ THC is a Schedule I controlled substance.

that she was tired. Troopers suspected that Reed was under the influence of controlled substances at the time due to pinpoint pupils, body tremors and the fact that she was sweating despite it being a cold day. Reed had sores on her face that were indicative of methamphetamine usage. Reed's blood was drawn at the hospital and toxicology results confirmed that Reed had caffeine, amphetamines and 430 nanograms per milliliter of methamphetamine in her system at the time of the crash. The reporting limit for methamphetamine is 5 nanograms per milliliter.

Troopers also smelled the odor of marijuana emanating from the vehicle while they investigated the crash. As a result, they obtained a search warrant to search the vehicle. Recovered from the rear passenger area was a black backpack containing methamphetamine. Various items of drug paraphernalia were also located, including two digital scales. Twenty-two bricks of suspected heroin were recovered, with the bags being stamped "Time Out." Another 41 bundles of suspected heroin stamped "Time Out" and an additional 90 bags of suspected heroin stamped "Time Out" were also located. Various marijuana items, two rolled marijuana joints, pills, multiple cellular telephones and \$16,740.00 were also recovered from the vehicle. Testing by the PSP Laboratory confirmed that the total amount of methamphetamine located inside the vehicle was 239.73 grams. Testing also revealed that the suspected heroin was actually fentanyl. The 42 bricks (1101 total bags) weighed approximately 8.9 grams. The 41 bundles (410 bags) weighed approximately 3.9 grams. Finally, the 90 bags were weighed with packaging and weighed approximately 18.91 grams.

On April 7, 2021, the Honorable Victor Stabile of the Pennsylvania Superior Court signed an Order authorizing OAG agents to intercept wire and electronic communications on Fowler's telephone. On April 27, 2021, OAG agents were also authorized to intercept wire and electronic communications on the telephone of one of Fowler's sources of supply: Marc Bankes ("Bankes").

Through the use of these interceptions, coupled with surveillance, agents were able to identify the following individuals as participants in Fowler's drug trafficking organization: Bankes, Anthony Leming ("Leming"), Michael Rowello ("Rowello"), Scott Reabuck ("Reabuck"), Nikolaus Andrews ("N. Andrews"), Thomas Priar ("Priar"), and Douglas Farner ("Farner"). Previously identified co-conspirators, Trump and Reed, were also captured on the non-consensual interception. Fowler and the other members of his drug trafficking organization often used coded language to discuss their operation. Throughout this Presentment, conversations between relevant parties are paraphrased and references to specific controlled substances and/or quantities of controlled substances are based on the conclusions of NA Zitsch. He formed these conclusions based on his training and experience, in addition to his personal involvement in this investigation, and his review of the context and content of all intercepted communications.

Intercepted communications between Fowler and Bankes revealed that Bankes supplied controlled substances to Fowler and facilitated the delivery of controlled substances from Leming to Fowler. Bankes further facilitated the distribution of controlled substances by providing a location for Leming and Fowler to meet to conduct their drug transactions. The Grand Jury heard testimony that Bankes is the owner of The Mystery Box, a head shop/pawn shop located at 201 East Second Street in Berwick, Columbia County. The location is accessible through 204 Pine Street in Berwick. Through physical and video surveillance used in conjunction with audio surveillance conducted via the non-consensual interception, investigators identified the Mystery Box as a place where Bankes, Leming and Fowler would meet in order for Fowler to obtain a re-supply of additional quantities of methamphetamine.

The Grand Jury heard testimony that on April 7, 2021, Fowler informed Reed that he was going to "The Box" and Reed asked if she could go along. Fowler was reluctant, informing her

that he did not like taking people with him to that location. That same night, Fowler spoke with Farner to confirm that he was meeting with his supplier, but had not yet left the area. The two spoke of law enforcement in the area and Farner told Fowler "not to do anything impatient and not smart." Farner also told Fowler to contact him when he returned from Berwick so that the two of them could meet.

Surveillance occurring around the same time as the intercepted communications verified that Fowler was travelling to and from The Mystery Box into the early morning hours of April 8, 2021. An argument intercepted between Fowler and Reed confirmed that Fowler was in Berwick to obtain "Ice," a common slang term for methamphetamine, and that Fowler would not leave Berwick until he met with "Marc" (Bankes) to obtain the methamphetamine.

Fowler returned from Berwick on April 8 and went to the Radisson Hotel in Camp Hill, Cumberland County. Communications between Fowler and Farner revealed that Fowler was able to obtain controlled substances from Bankes. Fowler and Farner agreed to meet at the hotel and surveillance confirmed the two met at 4:14 p.m. that day. Fowler met Farner outside the hotel and the two of them went inside. At 5:27 p.m., Farner left the hotel and was followed to Joann Fabrics in Lemoyne, Cumberland County. Surveillance observed Farner meet with two separate people in the parking lot and engage in conduct consistent with drug transactions.

During a conversation with Bankes on April 8, Fowler stated that he was "sitting on zero," indicating that he did not have any methamphetamine left at that time, and needed to obtain additional quantities of methamphetamine prior to travelling to State College. Bankes informed Fowler that they could likely meet in order for Fowler to re-supply the following day after 7:00 p.m.

Communications occurring on April 9, 2021 confirmed that Fowler travelled to The Mystery Box to obtain additional quantities of methamphetamine. Farner contacted Fowler that day to determine whether Fowler was able to re-supply him with methamphetamine. Fowler informed Farner that he would give Farner what he had. Fowler further stated that he was travelling to State College, but had to re-supply first. Farner and Fowler agreed to meet at Mutzabaugh's Market in Duncannon, Perry County in order for Farner to provide Fowler with money to purchase additional quantities of methamphetamine. Farner agreed to provide \$2,000.00 to \$2,500.00 as payment for a previous drug debt. Fowler expressed his intention to use the money to purchase additional quantities of methamphetamine.

Through surveillance, Farner and Fowler were observed meeting at Mutzabaugh's Market between 5:05 and 5:21 p.m. on April 9. After that, Fowler travelled to Berwick. Surveillance verified that Fowler entered The Mystery Box late that evening. Communications between Farner and Reed during the early morning hours of April 10, 2021 revealed that he had just obtained the controlled substances.

Fowler, Farner

On April 10, Fowler contacted Bankes and asked if he could obtain an additional pound of methamphetamine. The two arranged to meet. Through surveillance, Fowler was observed in and around The Mystery Box during the relevant time period of the communications.

On April 15, 2021, Fowler and Bankes engaged in a discussion about Fowler obtaining up to three pounds of methamphetamine. Fowler inquired if he would receive a discount for ordering such a substantial amount of methamphetamine at one time. Bankes responded that he thought it was likely that he would. Bankes advised that he would ask his source of supply - - ultimately identified as Leming - - about the potential discount.

Prior to purchasing the methamphetamine, Fowler needed to secure enough money to complete the purchase. It was revealed through intercepted communications that Reabuck owed Fowler for a prior drug debt. Reabuck was willing to pay off the drug debt and provide Fowler with \$2,500.00 in exchange for eight ounces of methamphetamine. The two agreed to meet at the residence of Fowler's mother, located a few blocks from The Mystery Box, in order to complete the transaction. Through surveillance, Reabuck was observed arriving at the residence. He did not leave until Fowler had returned from The Mystery Box after obtaining methamphetamine.

On April 21, 2021 Bankes informed Fowler they were getting "a whole load" that day. Surveillance observed Fowler entering and exiting The Mystery Box later that day. On April 23, 2021, Reed inquired as to whether Bankes was going to have methamphetamine available. Fowler stated that he did not know, but was heading to "Marc's." Fowler was observed leaving his mother's residence with a plastic bag. Almost one hour later, Fowler was observed leaving The Mystery Box and returning to his mother's residence with the plastic bag, which appeared fuller than before.

Between April 26 and 27, 2021, Fowler had numerous conversations with Bankes, Farner and Reabuck related to obtaining additional quantities of methamphetamine. Fowler initially inquired as to whether Bankes could contact Leming, Bankes' source of supply. Bankes was observed arriving at The Mystery Box and Fowler was observed arriving at his mother's house between 8:30 and 9:00 p.m. that night. Upon arrival at his mother's residence, Fowler informed Farner that he had arrived and Farner indicated that he was out of controlled substances and waiting to be re-supplied. Fowler, using coded language, informed Farner that he had two ounces and had travelled to Berwick to re-supply. Surveillance observed Fowler entering and exiting The Mystery

Box that night, but a conversation between Fowler and Reabuck confirmed that Fowler would not be able to re-supply with methamphetamine until the following day.

During the morning of April 27, 2021, Fowler informed Reabuck that the methamphetamine would be arriving in one-half hour. Approximately 40 minutes later, Leming arrived and entered The Mystery Box. He left approximately 15 minutes later. Fowler then entered The Mystery Box approximately 15 minutes after that and subsequently contacted Reabuck to confirm that he had obtained a quantity of methamphetamine. A subsequent conversation between Fowler and Reed revealed that Fowler had not obtained all of the methamphetamine that he had intended to purchase. Fowler stated that he left money with Bankes for the re-supply.

Later that night, Fowler informed Reed that he was going to The Mystery Box, which was confirmed through surveillance. Approximately 15 minutes later, Leming returned and entered The Mystery Box. He left about 20 minutes later with Fowler exiting shortly thereafter. Fowler subsequently texted Reed to state that, "Marc just now got that to me."

On May 5, 2021, Fowler told Bankes that he wanted to see him that day, but did not have a ride. The two agreed to meet the following day, with Bankes stating that Leming was waiting for them to do "the first half anyway." Through video and physical surveillance, it was confirmed that Fowler and Reed arrived at Bankes's residence at 3000 Old Berwick Road in Columbia County during the afternoon of May 6, 2021. Leming later arrived and entered the residence. A few minutes later, Reed exited the residence and returned to her vehicle. Leming then left the residence. Over the course of the next one-half hour, Fowler was observed exiting and re-entering the residence after going to Reed's vehicle. Approximately one and one-half hours after Leming left, Fowler contacted Reed to inform her that he was waiting for Bankes' source to return with the methamphetamine. Farner contacted Fowler to inquire into the state of the methamphetamine

supply, indicating that his "people" were "chomping at the bit." Farnier asked Fowler not to forget about him and increased his typical order to six ounces. Fowler informed Farnier that he had "one," but the other would not be ready for another hour. NA Zitsch testified that this was a reference to having one pound and waiting for the other pound to arrive.

Later that night, Leming returned to the Old Berwick Road residence and entered with a backpack. He left through the garage a short time thereafter. Approximately ten minutes later, Fowler left the residence and returned ^{to} the Reed's vehicle before departing the area.

Fowler and Farnier then engaged in a text conversation wherein the two agreed to meet at the Red Carpet Inn in Duncannon, Perry County. The following day, May 7, 2021, Farnier stated to Fowler, "These people are owned by this substance, bro." Fowler replied, "Yeah, I know." Farnier advised that he had \$2,500.00 for Fowler. Fowler stated that he had obtained another pound of methamphetamine that day and anticipated getting an additional pound the following day.

On May 10, 2021, Farnier, using coded language, inquired if Fowler could provide him with methamphetamine. Fowler indicated that he could. At 2:39 p.m., Fowler informed Farnier that he had to travel to obtain the drugs. He advised that another person had contacted him and ordered one pound of methamphetamine. Fowler confirmed that he had already made arrangements to obtain the pound. Because of that, Fowler believed there would be no wait and informed Farnier he would contact him on his way back. Farnier asked Fowler how much he (Farnier) owed. Fowler replied, "25," meaning \$2,500.00.

The Grand Jury heard testimony that on May 14, 2021, Fowler spoke with Trump who advised that he was out of controlled substances. Fowler responded that he had to make a trip to be re-supplied. Mobile communication tracking information from Fowler's telephone revealed that he travelled to Berwick at this time. He was observed entering and exiting The Mystery Box

that night. Approximately one hour after Fowler left The Mystery Box, Leming arrived at that location. Fowler returned to The Mystery Box about one-half hour later and was observed leaving shortly after midnight on May 15, 2021. Fowler subsequently spoke with Reabuck, who inquired into how much methamphetamine Fowler had. Fowler replied that he had a little over a "pig." NA Zitsch testified that the word "pig" was a code word for one pound of methamphetamine.

Additional conversations between Fowler and Reabuck were recorded during the course of the non-consensual interception. On April 13, 2021, the two discussed money that Reabuck had for Fowler, if Fowler was in the area. Fowler eventually asked Reabuck if he needed additional quantities of methamphetamine. Reabuck responded that he might need four ounces, but that he still had quantities of methamphetamine at that time. That evening, Fowler informed Reabuck that he had to travel to Hazleton, Luzerne County, to re-supply because his normal suppliers - - Bankes and Leming - - did not have methamphetamine at that time. Reabuck stated that he had money for Fowler and offered to wire the money to him. Fowler refused the offer, advising that it would establish a paper trail that could allow law enforcement to track the funds.

On April 15, 2021, Fowler and Reabuck discussed a meeting to engage in the distribution of methamphetamine. Reabuck stated that he needed four ounces and Fowler replied that he was obtaining three "hogs," meaning pounds of methamphetamine. Despite ordering four ounces, Reabuck admitted to Fowler that he was currently in possession of seven ounces of methamphetamine. Reabuck indicated that he would be distributing four ounces in a day or two and felt comfortable ordering additional quantities at that time. Reabuck subsequently informed Fowler that he had \$2,500.00 and increased his order to eight ounces. The remaining conversation between Reabuck and Fowler was outlined above with Reabuck agreeing to meet Fowler at his

mother's house so that Fowler had enough money to purchase the three pounds of methamphetamine.

On April 23, 2021, Reabuck ordered an additional eight ounces of methamphetamine from Fowler. Reabuck asked Fowler to have the methamphetamine ready for him so that he could "grab it and run." On April 26, 2021, Fowler and Reabuck discussed the seizure of a large quantity of methamphetamine by United States Customs agents at the United States-Mexico border. Reabuck advised that if the seizure caused prices to rise, he was done dealing methamphetamine. In a subsequent conversation that day, the two discussed marijuana and THC products that Fowler had for sale. Fowler stated that he had been to the residence of N. Andrews, his marijuana source, and that N. Andrews had just obtained new equipment to make marijuana and THC products.

The two men then discussed Reabuck setting up a drug trafficking operation in Bradford County. Fowler provided guidance on the manner in which Reabuck should begin to establish this operation. Reabuck indicated his interest in doing so and Fowler informed him that he was serious about it, as well. Fowler then compared his plan for Bradford County to what he set up in Perry County. Fowler stated, "That's what I did here in Perry County, man. I fu*ked this bitch over."

The Grand Jury learned that on May 1 and 2, 2021, Reabuck ordered THC cartridges and methamphetamine from Fowler. Reabuck had to reduce the order of methamphetamine, which ultimately led to the cancellation of the transaction that day. On May 3, 2021, Reabuck talked about misplacing \$4,400.00. Fowler informed Reabuck that he had approximately two pounds of methamphetamine at that time and offered to help Reabuck with his financial situation. Reabuck advised that he had methamphetamine to sell and would be ready to meet with Fowler later in the week.

On May 4, 2021, Reabuck had \$2,000.00 and informed Fowler that he needed "Ice." Reabuck ordered at least four ounces, but stated that he was open to purchasing up to eight ounces. Fowler advised that he needed to weigh out the methamphetamine and the two agreed to travel together to the residence of a friend of Reabuck's in order to weigh it. Through surveillance, the two men were observed meeting at a gas station near Reabuck's residence and then travelling to a residence on Valley Road to complete the transaction.

On May 9, 2021, Reabuck ordered an additional eight ounces of methamphetamine from Fowler. Fowler informed Reabuck that he had just purchased high quality methamphetamine in Bethlehem, Northampton County. Reabuck then increased his order to "a whole elbow," which is drug terminology for one pound of controlled substances. Fowler stated that he could provide that amount or an amount close to it. Through surveillance, Fowler was observed travelling from Perry County to Bethlehem where he met with Bankes at a casino in order to obtain the methamphetamine.

Rowello was also captured on the non-consensual interception communicating with Fowler regarding the distribution of controlled substances. On April 12, 2021, Fowler contacted Rowello to determine whether Rowello needed quantities of methamphetamine. Rowello informed Fowler that he needed four ounces. Later that night, Fowler informed Rowello that he had just re-supplied and the two agreed to meet at Rowello's residence. Fowler informed Rowello that he was travelling with several people, including Reed, "Rick," and "Tina." Fowler asked for permission to bring those people inside so as to not draw attention to their activity by leaving them in the car. Rowello agreed. Surveillance observed Fowler and the other individuals enter Rowello's residence and leave during the early morning hours of April 13, 2021.

On April 22 and into April 23, 2021, Rowello attempted to purchase eight ounces of methamphetamine from Fowler. Fowler informed Rowello that he was tired and wanted to complete the transaction the following day. Rowello replied that he had customers waiting, trying to encourage Fowler to complete the transaction that day. Fowler was not persuaded and did not meet with Rowello until the following day. Surveillance observed Fowler and Reed arrive at Rowello's residence and enter. Prior to entering the residence, Fowler opened the vehicle's trunk. Surveillance observed Fowler and Reed subsequently leave the area. Rowello then exited the residence and tossed a garbage bag into a dumpster.

On May 4, 2021, Rowello informed Fowler that he needed to meet with him to obtain controlled substances. The two agreed to meet prior to Rowello leaving for work. Fowler told Rowello he was once again travelling with "Rick" and "Tina" in order to confirm that Rowello approved of them entering the residence again. Rowello agreed, but indicated that he needed to hurry in order to be at work on time. Fowler informed Rowello that he just had to put the methamphetamine into a bag for him and he would be on his way. Surveillance confirmed Fowler's arrival at Rowello's residence. Surveillance further confirmed that Fowler left the residence approximately ten minutes later.

Between May 13 and May 15, 2021, Rowello ordered methamphetamine and marijuana edibles from Fowler. Fowler initially explained that he had six-to-eight ounces of methamphetamine, but did not have any edibles with him at that time. During a string of text messages occurring between May 14 and May 15, it became apparent that the two made arrangements to complete the drug transaction.

Despite his interaction with law enforcement on February 4, 2021, Trump continued to participate in the trafficking of controlled substances that he obtained from Fowler. Non-

consensual interceptions occurring on April 28 and April 29, 2021 revealed that Trump ordered four ounces of methamphetamine. However, within an hour, Trump increased his order to eight ounces. The two men could not meet on April 28 because Fowler was unable to obtain a ride. However, on April 29, the two completed the transaction. Fowler confirmed that Trump still wanted eight ounces and advised that he would be coming to meet Trump once Reed was ready. Surveillance observed Fowler and Reed's vehicle at Trump's residence later that night.

On May 7, 2021, Trump contacted Fowler and informed him that he was "looking to grab some shit." Fowler told Trump that he would send Reed with five ounces of methamphetamine. Around 12:36 p.m., Fowler informed Trump that Reed would be there in 30 minutes. Approximately one-half hour later, Trump responded and asked if \$2,000.00 was sufficient payment at that time. Fowler simply replied, "Yes." Fowler sent a text message a short time later to inquire as to whether Reed had arrived yet. Trump responded that she was there. During a subsequent conversation between Reed and Fowler, Reed told him to come outside and retrieve the money from "Brad," indicating that she had delivered five ounces of methamphetamine to Trump and was now providing Fowler with Trump's payment.

On May 11, 2021, communications between Trump and Fowler revealed that Fowler supplied Trump with controlled substances on two occasions: Once in the morning and once in the evening. During the evening of May 11, Trump informed Fowler that he was "running on E," indicating that he was out of controlled substances. Approximately 20 minutes later, Fowler called Trump to ask how much he needed. Trump replied that he needed six ounces. Fowler subsequently called Trump to inform him that he was on his way to Trump's location. Mobile communication tracking information on Fowler's phone confirmed that Fowler travelled from Cameron Street in Harrisburg to Trump's residence.

Fowler's marijuana and THC product supplier, N. Andrews, was also captured on the non-consensual interception. On April 7, 2021, Fowler informed N. Andrews that he needed some "flower," meaning that Fowler was looking to obtain marijuana. During their discussion, N. Andrews inquired about Fowler's methamphetamine distribution. N. Andrews indicated that he was not trying to be nosy, but wanted to know how much Fowler was paying for methamphetamine. Fowler responded, "62," meaning \$6,200.00 for a pound. N. Andrews informed Fowler that he was going to "work on that" for him.

On April 9, 2021, N. Andrews asked Fowler if he was ready to meet yet. Fowler stated that he was ready to meet, but only for one pound of marijuana. N. Andrews informed Fowler that he had "Purple Punch" and "Jet Fuel OG" strains of marijuana available for sale. Fowler provided Andrews with his current location and reiterated that he only wanted one pound of marijuana.

The following day, April 10, 2021, Fowler informed N. Andrews that he needed additional quantities of marijuana and that he wanted to purchase THC cartridges. Fowler subsequently called N. Andrews that same day to confirm the name of the marijuana he previously purchased.

On April 20, 2021, N. Andrews sent Fowler a text message which outlined an entire order with prices and quantities of marijuana and THC products. The text read, "I can do three plates, 200 carts, four eighths of designer tree, ten roll of garden wax, quarter roll of 47 wax, eighth of animal minz wax for \$11,000 even." Fowler responded by stating that the proposed order was too large and would exhaust all of the money Fowler had at that moment.

On April 21, 2021, N. Andrews and Fowler agreed to meet at "Pappy's" house, the home of Barry Melhorn ("Melhorn"), located at 302 West Juniata Parkway in Millerstown, Perry County. Surveillance observed N. Andrews arrive at this location and retrieve a black duffel bag from the trunk of his vehicle before entering the residence. Approximately one hour later, N.

Andrews left the residence with the duffel bag. After placing the duffel bag in the trunk, he left the area and travelled to Trump's residence at 88 Rock Hollow Road.

On April 22, 2021, Fowler called N. Andrews and asked, "What was the name of those buds I got off you?" N. Andrews advised that it was "Lava Cake" and "the one with the seeds was either 'Purple Mendo Breath' or 'Purple Punch Mendo Breath'." Fowler subsequently called N. Andrews to complain about the marijuana with the seeds. Fowler believed that no one would want to buy marijuana with that many seeds in it. N. Andrews asked if Fowler had tried the marijuana. Fowler responded that it did not matter whether he wanted the marijuana, what mattered was whether other people would want it. This confirmed that Fowler was re-distributing the marijuana. The following day, Fowler advised that he was having trouble distributing the marijuana with the seeds and that he had only sold some of it. N. Andrews offered to switch out that marijuana with another product.

On April 25, 2021, N. Andrews was in possession of one pound of marijuana. N. Andrews agreed to replace Fowler's marijuana with the marijuana he currently possessed. N. Andrews then told Fowler that once marijuana was legalized, there would still be a market for them, but marijuana would be cheaper. Later that evening, the two men made arrangements to meet to complete the previously discussed transaction. Surveillance observed Fowler arrive at N. Andrews' residence at 17 Beechwood Drive in Middletown, Dauphin County and enter the residence.

Priar was also captured during the course of the non-consensual interception. Agents were able to determine that Fowler had been living at Priar's residence located at 189 Bedford Trail in Ickesburg, Perry County approximately three-quarters of the time when the non-consensual

interception was active. Surveillance followed Fowler back to this location several times after he re-supplied with methamphetamine.

On April 18, 2021, Fowler contacted Farner to inform him that, "Tommy needs shit." Fowler then texted, "He got a client out here." Farner replied, "Cool." NA Zitsch testified that Fowler contacted Farner in order for Farner to provide Priar with controlled substances which Priar would then re-distribute.

On May 17, 2021, Fowler contacted Priar. Fowler told Priar that he was going to take a ride and leave all of his belongings in the bedroom. Priar asked Fowler if he was going to get "stuff." Fowler confirmed that he was, stating that he was going to "grab" and then come right back to Ickesburg. Priar then stated, "The dude is on his way."

On May 19, 2021, OAG agents executed search warrants at the following locations: The residence of N. Andrews at 17 Beechwood Drive in Middletown, Dauphin County; The Mystery Box at 201 East 2nd Street/204 Pine Street in Berwick, Columbia County; Rowello's residence at 445 Spring Street in Danville, Montour County; Bankes' residence at 3000 Old Berwick Road in Bloomsburg, Columbia County; Priar's residence at 189 Bedford Trail in Ickesburg, Perry County; Melhorn's residence at 302 West Juniata Parkway in Millerstown, Perry County; Trump's residence at 88 Rock Hollow Road in Elliotsburg, Perry County; and, ~~(S)~~ Reabuck's residence at 82 Lover Drive in Bloomsburg, Columbia County.

N. Andrews was at his home when the search warrant was executed. After being advised of his Miranda rights, he agreed to cooperate with law enforcement, but stated he would not "snitch" on anyone. He admitted to Narcotics Agent James Hinton that he had a large quantity of marijuana in a garage attached to the residence. He further stated that all of the marijuana and marijuana products in the house belonged to him. Although Andrews identified the contraband

located in the garage, he failed to mention a duffel bag located in the basement which contained a larger quantity of marijuana as well as a large quantity of United States currency. While the warrant was being executed, N. Andrews repeatedly asked the agents why they were there and insisted that it could not just be for marijuana. At some point he stated that it probably had something to do with "Perry County." Agents recovered the following from the residence of N. Andrews: Twenty-four Psilocybin⁶ mushroom chocolate bars; 17 packs of THC gummies, 21 THC vape cartridges; 30 vials of marijuana wax; two black bags containing marijuana; empty containers for marijuana and marijuana wax; over \$12,000.00 in United States currency; a t-shirt/oil press; a box containing plastic tubes; packaging materials; a plastic bag containing molds to make THC gummies; a heat sealer; a scale; and, another bag of marijuana. Many of the items recovered were consistent with the manufacture of marijuana-related products.

Agents who executed the search warrant at The Mystery Box recovered the following items from a safe⁷ in the office area: Marijuana in a container marked "Purple Mendo Breath;" approximately 359.39 grams of methamphetamine; THC wax; one handgun and three shotguns. Bankes' driver's license and other documents related to him were also recovered from the safe. NIK tests were performed on the marijuana and THC wax which yielded positive results. Testing by the PSP Laboratory confirmed the presence of methamphetamine in the amount specified above.

The search of Bankes' residence at 3000 Old Berwick Road led to the seizure of the following items: One F & B, nine millimeter caliber handgun; multiple digital scales; a small

⁶ Psilocybin is a Schedule I controlled substance.

⁷ Agents were able to gain access to the safe after Bankes provided the combination. Bankes was at his home when agents executed the search warrant there. He provided the combination to the agents who subsequently passed it along to the agents who were searching The Mystery Box.

amount of marijuana; psilocybin mushrooms; THC cartridges; and, one clear plastic bag containing methamphetamine. The bag of methamphetamine returned a presumptive positive result for methamphetamine pursuant to a NIK test that was conducted by OAG agents. The methamphetamine weighed approximately 63.2 grams with packaging.

When agents executed the search warrant at Rowello's residence, he was apprehended as he attempted to flee. During the search, agents located approximately 367 grams of methamphetamine, \$9,328.00 and one handgun. A NIK test was conducted on the methamphetamine and returned a positive result. Rowello was advised of his Miranda rights and agreed to speak with investigators. He admitted to obtaining methamphetamine from Fowler. Specifically, he advised that he obtained four ounces of methamphetamine at a time, but occasionally obtained more.

Reabuck was home when the search warrant was executed at his residence. The following items were recovered pursuant to the search: Approximately 359.48 grams of methamphetamine; approximately .86 grams of crack cocaine; 38 Suboxone pills; 68 pills containing a mixture of fentanyl and tramadol;⁸ approximately 1.34 additional grams of methamphetamine; approximately 5.42 grams of THC wax; approximately 62.21 grams of marijuana; three digital scales; various pills; three cellular tele^ephones; \$4,600.00; marijuana grinders; 42 rifles; and, seven handguns. Additionally, agents located a methamphetamine clandestine laboratory manifesto. The Grand Jury learned that this handwritten manifesto explained how to create a methamphetamine lab and/or produce methamphetamine through a one-pot system in a residence. The controlled substances were sent to the PSP Laboratory which confirmed the identity and weights of the substances identified above.

⁸ Tramadol is a Schedule IV controlled substance.

Following the execution of the search warrant, Reabuck was provided with his Miranda rights and agreed to speak with investigators. He admitted that the methamphetamine and marijuana located inside the residence belonged to him. He stated that he obtained the methamphetamine from Fowler and had been dealing with Fowler for a few months. He admitted to purchasing between four-to-eight ounces of methamphetamine at a time from Fowler.

When agents executed the search warrant at Melhorn's residence, he was present along with three other individuals. Agents seized the following during the search: Four bundles of heroin; five loose bags of heroin stamped "Time Out;" a metal vial containing approximately 13.9 grams of heroin; a glass vial containing approximately 20.8 grams of methamphetamine; a vape pen; two THC cartridges; three digital scales; approximately 124.5 grams of marijuana; three rubber cases of THC wax; two containers of THC wax; a blue metal container of methamphetamine; and, a plastic bag containing approximately 1.5 grams of methamphetamine; and, packaging material. NIK tests were performed on all of the substances and returned positive results for the substances previously identified.

Trump was home when the search warrant was executed at his residence. After being advised of his Miranda rights, he identified several locations where contraband could be located inside his residence. When initially asked whether there were drugs inside his home, Trump advised of a half-ounce of methamphetamine in a toolbox near his bed. A clear, plastic sandwich bag that contained methamphetamine was clearly visible in the toolbox, according to NA Zitsch. NA Zitsch then asked if there was any other contraband within the residence and Trump identified a box on his bed. When asked what was in the box, Trump stated that there was approximately one pound of methamphetamine inside of it. NA Zitsch opened the box and located multiple bags of methamphetamine. Agents also located the following: Numerous buprenorphine pills; two

digital scales; THC cartridges and gummies/candies; marijuana in a heat-sealed container; THC wax; packaging materials; and, various smaller/personal use bags of methamphetamine and marijuana/THC products. Testing by the PSP laboratory confirmed the presence of methamphetamine, weighing approximately 435.34 grams. The suspected marijuana in the heat-sealed container was confirmed to be marijuana, weighing approximately 434 grams. Finally, testing confirmed the presence of delta-9 THC in the wax, weighing approximately 16.36 grams.

When agents executed the warrant at Priar's residence, Fowler and Priar were present along with two females. Miranda rights were provided to everyone and all agreed to speak with the agents. The following items were located during the search: Approximately 552.05 grams of methamphetamine; 32 "bricks" (1,598 baggies) of suspected heroin stamped "Time Out;" 20 individual bags of suspected heroin; approximately 901.3 grams of marijuana; approximately 138.1 grams of THC wax; \$8,550.00; assorted packaging materials; and, digital scales.

The PSP laboratory confirmed the weight and identity of the methamphetamine. Testing further revealed that the suspected heroin contained in the 32 "bricks" had an approximate weight of 9.4 grams and contained fentanyl. Three of the 14 bags analyzed also contained heroin. The 20 individual bags of suspected heroin were tested and found to weigh approximately .13 grams and contain fentanyl.

In his statement to investigators, Fowler stated that he was introduced to Priar through Farnier. Fowler stated that the heroin seized from inside the residence initially belonged to him prior to him selling it to Priar the previous evening. Fowler then identified his sources for methamphetamine, including Bankes and Leming. Fowler described Bankes as a middle-man and identified Leming as Bankes' methamphetamine source. Fowler admitted to obtaining methamphetamine from Bankes approximately one or one and one-half weeks prior at Bankes'

residence. Fowler then identified Lening as the person who arrived and supplied Bankes with methamphetamine at that time. Fowler admitted to meeting Bankes several weeks prior at a Sheetz in Selinsgrove. Finally, Fowler identified his source for marijuana, psilocybin mushrooms and THC products as N. Andrews.