COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 VS. MDJ: Hon. Elizabeth R. Frownfelter (NAME and ADDRESS): Address: 3553 Shermans Valley Road ANTHONY LEMING First Name Loysville, PA 17047 Middle Name Last Name Ge 80 Main Street Berwick, PA 18603 Telephone: (717)789-4117 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ F-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number Complaint/Incident Number Services? R 168963-4 CR-428-21 8129121 ☐ YES ☐ NO BN3200109XM 😘 **GENDER** ров 7/12/1969 Co-Defendant(s) Add'I DOB First Name Middle Name Last Name Gen. ☐ Female AKA RACE ☑ White Asian Black Native American Unknown ETHNICITY Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair ONG (Orange) BLK (Black) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color 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 Ft. HEIGHT In. Fingerprint Classification: 0 DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth, NCIC Veh. Code Reg. mat Ind. Plate # Sticker (MM/YY) same as Def, VIN Year Make Model Style Color Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG ROBERT SMULKTIS 08/22/2021 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) AGENT KURT ZITSCH BNIDC - #621 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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)

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

in PERRY County

[50]

総	POLICE	CRIMINAL	COMPLAIN

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Docket Number:	Date Filed:	O.	TN/LiveScan Ñ	lumber			olaint/Incident 200109XM	Number
Defendant Name:	First: ANTHONY		Middle:		La	·····		
Little and a special for the second control of the second control							•	·.
The acts committed by							e allegedly vic	lated, if appropriate.
When there is more the (Set forth a brief summary o	f the facts sufficle	nt to advise the defe	ndant of the natu	re of the off	ense(s) c	harged. A c	citation to the sta	tute(s) allegedly violated,
without more, is not sufficie The age of the victim at the	ime of the offense	may be included if	known. In additio	n, social se	curity nun	nbers and t	financial informa	nce(s) allegedly violated. iion (e.g. PINs) should not
be listed. If the Identity of an	account must be	established, list onl	the last four dig	its, 204 PA.	Code §§ 2	?13.1 – 213.	7.)	
Inchoate			Conspiracy 18 903		N	lumber of	Victims Age 60	or Older
☑ 1 911	(B)	(3) of the	TITLE 18	1	F	F1		
Lead? Offense . Se		section	PA Statute (Tit	ile) Co	ounts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			☐ Inters	tate		Safety Zone	☐ Work Zone
Statute Description (inc	lude the name	of statute or ord	linance): corr	UPT ORG	ANIZATI	ONS		<u> </u>
Acts of the accused as	enciated with th	ie Offenso: Bata	oon luke 22, 2020	and Marri	10 2021	the Defer	lant did access to	ov modelning-to afficient
indirectly, while being emplo	ed by or associate	ed with an enterprise	e, in the conduct of	of such ente	erprise's a	ffairs throu	gh a pattern of r	acketeering activity, that
is, during the periods as set to of controlled substances (me	thamphetamine an	d/or heroin/fentany	l and/or marijuan:	a) with the	intent to	distribuțe, d	did conduct or pa	rticipate directly or
indirectly in the affairs of sak 18 PA. C.S. 911 (B) (3). The	pattern of racketed	ering consists of mul	tiple acts of violat	tion of the (Controlled	Pa.C.S. § 91 Substance	.1(h)(1) all of wh , Drug, Device ar	ich is in violation of Title and Cosmetic Act, 35 P.S. §
780-113(a) (30), specifically	to include, but not	limited to, the offer	ses outlined in th	ls complain	<u> </u>			
Inchoate	☐ Soli	citation [] (Conspiracy	7	N	umber of	Victims Age 60 o	or Older
Offense 18 901 A	18 9	02 A 1	8 903					
□ 2 911	(B)((4) of the	TITLE 18	1	F:	1		
	ction Sub	section	PA Statute (Tit	le) Coi	unts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data / (if applicable)	ccident Number			☐ Inters	tate		Safety Zone	☐ Work Zone
Statute Description (inc	lude the name	of statute or ord	inance): corr	UPT ORGA	NIZATIO	ONS		
Acts of the accused ass	ociated with th	is Offense: Betwe	een July 23, 2020	, and May 1	19, 2021,	the Defend	ant did, within th	e County of Perry and
elsewhere, conspire to violate during the periods as set fort	n herein, Defendar	it, with the intent of	promoting or fac	llitating the	commissi	ion of the c	rime of Corrupt C	Organizations, did
conspire and agree with othe conduct or participate, directl	y or indirectly, in the	he conduct of the af	fairs of the enterp	orise throug	h a patter	rn of racket	eering activity as	defined in 18 Pa.C.S. §
911(h), in violation of Section Controlled Substance, Drug, I				The patte	rn of rack	eteering co	nsists of multiple	acts of violation of the
Inchoate ☐ Attempt Offense 18 901 A			Conspiracy 8 903	N	lumber o	f Victims A	ge 60 or Older	
□ 3 780-	113 (A)(30) of the	TITLE 35	. 1		F		*
Lead? Offense# PennDOT Data	Section St Accident	ubsection	PA Statute (Til	tle) Co ☐ Inte	ounts retate	Grade	NCIC Offense C	
(if applicable) Statute Description (incl	Number — ude the name o	of statute or ordi	nance). CRIMI				Safety Zone	☐ Work Zone
CONTROLLED SUBSTANCE DRUG, DEVICE AND COSM	DRUG, DEVICE,	AND COSMETIC	ACT, SECTION 7	80-113 (A)(30) OF	ACT 64 (THE CONTROLL	ED SUBSTANCE,
Acts of the accused ass	ociated with thi	s Offense: Betwe	en July 23, 2020,	and May 1	9, 2021, t	he Defenda	ant, Anthony Lem	ing , with the intent of
promoting or facilitating the cowhich constitutes a crime or d	id agree to aid suc	h other person or pe	ersons in the plan	ning or com	nmission o	of such crim	ne or of an attern	ot or solicitation to
commit such crime, that is, at Rowello, Oksana Reed, Chelse	y Andrews, Thoma	is Priar, Bradley Trui	mp, Douglas Farn	er, Nikolaus	Andrews	, Barry Mel	horn, Scott Reab	uck, and others,; that
they, or one or more of them, 780-113(a) (30)(methampheta	would engage in o mine and/or heroi	conduct constituting n/fentanvl and/or m	multiple violations arijuana), and in	s of the Cor pursuance	ntrolled Su of such co	ibstance Di onspiracy o	rug, Device and C ne or more overt	Cosmetic Act, 35 P.S. § acts were committed.

AOPC 412A - Rev. 7/18

	POLICE	CRIMINAL	COMPLAINT
. t. v. a filler to . c.	CLICE		COMI TVIIA

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

- 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 that non-confidential information and documents.

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

(Date)

AND NOW, on this date

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

SEAL

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

4/-3-05 (Magisterial District Court Number)

		- Wall #	OLIGE OF THE COMMENT
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First:	Middle:	Last:
Delenualit Name.	ANTHONY		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 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.

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

Date

Date

My commission expires first Monday of January, 2024.

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 VS. MDJ: Hon. Elizabeth R. Frownfelter (NAME and ADDRESS): Address: 3553 Shermans Valley Road BRADLEY ALLEN TRUMP First Name Middle Name Last Name Lovsville, PA 17047 Ge 88 Rock Hollow Road Elliottsburg, PA 17024 Telephone: (717)789-4117 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab OTN/LiveScan Number **Docket Number Date Filed** Complaint/incident Number Services? 168966-0 ☐ YES ☐ NO BN3200109XM GENDER ров 01/13/1981 Add'l DOB Co-Defendant(s) First Name Middle Name Last Name Male Gen. ☐ Female **AKA** RACE White ■ Black 🗌 Asian Native Americaп Unknown ETHNICITY Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLU (Blue) BRO (Brown) GRN (Green) BLK (Black) GRY (Gray) Eye HAZ (Hazel) MAR (Maroon) PNK (Pink) Color XXX (Unknown) **DNA** Location DNA ☐ YES □ NO WEIGHT (lbs.) FBI Number 358388KB1 **MNU Number** 160 ☐ YES ☐ NO Defendant Fingerprinted Ft. HEIGHT In. Fingerprint Classification: 6 0 DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh. Code State Haz Registration Comm'l Veh. School Veh. Reg. Ind. mat same Plate # Sticker (MM/YY) as Def. Make VIN Year 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 08/22/2021 (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) AGENT KURT ZITSCH BNIDC - #621 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. MI 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

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

with violating the penal laws of the Commonwealth of Pennsylvania at [214]

☐ 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

Various Locations (Place-Political Subdivision)



r r	T.					COMPLAINT							
Docket Number:	Date Filed: / /	OTN/LiveScan	Number		olaint/Incident Nu 200109XM	mber							
Defendant Name:	First: BRADLEY	Middle: ALLEN		Last: TRUMP	•								
The acts committed by	the accused are des	cribed below with each	Act of Assem	bly or statute	allededly violat	ed. if appropriate.							
When there is more that	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 sufficien	if. In a summary case, vo	u must cite the specific sect	ion(s) and subsect	ion(s) of the st	atute(s) or ordinance	e(s) allegedly violated.							
The age of the victim at the the listed. If the Identity of an	ime of the offense may be	e included if known. In additi	on, social security	numbers and f	inancial information	(e.g. PINs) should not							
po notout it the substitute of an													
Inchoate	☐ Solicitatio 18 902 A	n ☐ Conspiracy 18 903		Number of	Victims Age 60 or 0	Older							
⊠ 1 911	(B)(3)	of the TITLE 18	1	F1									
'Lead? Offense Se	ection Subsection	PA Statute (Title) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code							
PennDOT Data	Accident Number	,	☐ Interstate	·	Safety Zone	☐ Work Zone							
(if applicable) (incomplete Statute Description (incomplete)	lude the name of sta	 atute or ordinance): co i	RRUPT ORGANIZ	ATIONS									
Otatato Boson, Paron (,,	,			•							
Acts of the accused as	sociated with this Of	ense: Between July 23, 20	20, and May 19, 20	021, the Defend	dant did, conduct or	participate, directly or							
indirectly, while being employing, during the periods as set i	orth herein, within the Co	ounty of Perry, Pennsylvania	and elsewhere, wh	ille employed b	yor associated with a	an enterprise engaged							
in the possession of controlle directly or indirectly in the af	d substances (methamph	etamine and/or heroin/fenta	nyl and/or marijua	na) with the int	ent to distribute, did	conduct or participate							
violation of Title 18 PA, C.S.	911 (B) (3). The pattern (of racketeering consists of m	ultiple acts of viola	tion of the Cont	trolled Substance, Dr	rug, Device and							
Cosmetic Act, 35 P.S. § 780-	113(a) (30), specifically to	include, but not limited to.	the offenses outlin	ed in this comp	laint.	·							
[Standard State Stat													
Inchoate ☐ Attempt Offense	Solicitatio 18 902 A	n Conspiracy 18 903		Number of	Victims Age 60 or C	Older							
□ 2 911	(B)(4)	of the TITLE 18	1	F1									
Lead? Offense# Se	ction Subsection	PA Statute (Title) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code							
PennDOT Data (if applicable)	Accident Number	***************************************	☐ Interstate		Safety Zone	☐ Work Zone							
Statute Description (inc	lude the name of sta	tute or ordinance): cor	RRUPT ORGANIZ	ATIONS									
Acts of the accused ass Pennsylvania and elsewhere,	sociated with this Of	ense: Between July 23, 20	20, and May 19, 20	021, the Defend	dant did, within the C	County of Perry,							
Organizations, that is, during	the periods as set forth I	nerein, Defendant, with the in	ntent of promoting	or facilitating t	he commission of the	e crime of Corrupt							
Organizations, did conspire a herein, would conduct or par	nd agree with other indiv	duals, that they, or one or n	nore of them, while airs of the enterpri	e employed by o	or associated with the attern of racketeering	e enterprise set forth a activity as defined in							
18 Pa.C.S. § 911(h), in violat	ion of Section 911(b)(4)	of the Crimes Code, 18 Pa.C.	S. § 911(b)(4). Tl	he pattern of ra	cketeering consists of	of multiple acts of							
violation of the Controlled Su	bstance. Drug. Device an	d Cosmetic Act. 35 P.S. § 78	V-113(d) (3V),										
·	t ☐ Solicitatio	on 🛛 Conspiracy			A CO Oldan								
Inchoate ☐ Attemp Offense 18 901 /		18 903	Numk		Age 60 or Older	· · · · · · · · · · · · · · · · · · ·							
□ 3 780-	113 (A)(30)	of the TITLE 35	1	F									
Lead? Offense# PennDOT Data	Section Subsection Accident	n PA Statute	1		NCIC Offense Code								
(if applicable)	Number ——		☐ Interstate		Safety Zone	☐ Work Zone							
Statute Description (inc	lude the name of sta	tute or ordinance): CRI	MINAL CONSPIR	ACY TO COMI	MIT VIOLATIONS (OF THE DISUBSTANCE							
DRUG DEVICE AND COSM	FTIC ACT)			•									
Acts of the accused ass promoting or facilitating the co	ommission of a crime, did	l agree with one or more oth	er persons that the	ey or one or mo	ore of them would en	igage in conduct							
which constitutes a crime or o	lid agree to aid such othe	r person or persons the plan	ning or commission	n of such crime	or of an attempt or :	solicitation to commit							
such crime, that is, at various Nikolaus Andrews, Oksana Re	ed, Thomas Priar, Chelse	v Andrews, Douglas Farner,	Barry Melhorn, Mic	hael Rowello, S	icott Reabuck, and ot	thers,; that they, or							
one or more of them, would a	progre in conduct constit	iting multiple violations of th	ie Controlled Subst	ance Drug, Dev	ice and Cosmetic Act	t, 35 P.S. § 780-							
113(a) (30)(methamphetamir	e and/or heroin/fentanyl	and/or marituana), and in pi	ursuance of such c	onspiracy one c	ar more overt acts we	ere committed.							

AOPC 4124 - Rev. 7/18



Docket Number:				Filed:		OT:	N/LiveScar	N	umbei	•			laint/Incid 200109XI		nber
Defend	ant Name		First:	DLEY			Middle: ALLEN				Last: TRU				
<u></u>	·	<u> </u>	-		-										
Inchos Offen	2.2	Attempt 18 901 A		☐ Solicita - 18 902			nspiracy 903	Number of Victims Age 60 or Older							
	4	780-1	.13 ection	(A)(3		f the	TITLE 35			1 Counts	F	Grade	NCIC Offen	ise Code	UCR/NIBRS Code
PennDOT Data Accident												☐ 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.															
Incho Offen	10.000.00	Attempt 18 901 A		☐ Solici 18 902	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -			Numb	nber of Victims Age 60 or Older						
	5	780-		(A)(<u> / (%)</u>	of the	TITLE 3.			1	F		NCIC Offe		UCR/NIBRS Code
1. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	Offense# nnDOT Da	ta	Section Accid	lent	section		PA Statute	(11		Counts		Grade [Safety Zor		☐ Work Zone
Statute	applicable Descripti	on (incl	ude the	e name of	statute	or ordir	nance): DE	LIV IC	ERY O	F A CON	TROL	LED SUI	BSTANCE: S	SECTION	780-113 (A)(30)
Acts of did, as a included	the accus	sed ass d/or acco	ociateo mplice, PA Cont	d with this	Offense	: The de	fendant, Brad	dley	Trump	onfidentia	al infor	mation (CI) with said	d controlle	t January 14, 2021, d substance being or licensed by law to
Inchoa Offen	a thair a far a far a	Attempt 18 901 A		☐ Solicita 18 902			nspiracy 903			Numbe	r of V	ictims A	ge 60 or Old	der	
	6	780-1	13	(A)(3	マノ 強調	f the	TITLE 35			1	F				
/if s	Offense# nDOT Data applicable	a \	ection Accide Numb	er			PA Statute			Counts nterstate			NCIC Offen	e	UCR/NIBRS Code Work Zone
Statute	Descripti	on (incl	ude the	e name of BSTANCE, I	statute DRUG, DE	or ordii VICE A	nance): DE ND COSMET	IÇ	ERY O	F A CON	TROL	LED SUI	BSTANCE: S	SECTION	780-113 (A)(30)
did, as a substance	principal an e being incl	d/or acco	mplice, chedule	deliver a con	itrolled sul Controlled	ostance.	To Wit: MET	НΑ№	(PHETA	MINE. to	a conf	idential i	information ((CI) with s	t January 22, 2021, aid controlled eing authorized or



Docket		er:	Date /	Filed:	ОТ	N/LiveScan	Nun	nber				olaint/Incident 200109XM	Numl	per
Defend	ant Nar	ne:	First: BRAD	DLEY		Middle: ALLEN			1	Last: TRUN	/IP			
Inchos Offens	1	☐ Attempt 18 901 A		☐ Solicitation 18 902 A	Conspiracy Number 18 903			Number	r of Vic	ctims A	ge 60 or Older			
Lead?				(A)(30) Subsection	of the TITLE 35				Counts	F	Grade NCIC Offense		ode	UCR/NIBRS Code
Pen (if a	nDOT l	Data ble)	Accide Numb	ent				_	nterstate			Safety Zone	70117	☐ Work Zone
OF ACT	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: 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.														
Incho Offen	1000	☐ Attemp		Solicitation 18 902 A		onspiracy 8 903			Numb	ber of Victims Age 60 or Older				***************************************
	8	780-		(A)(30)	dillamate description for the re-	TITLE 35			1 Counts	<u></u> F	Grade	NCIC Offense C	ode:	UCR/NIBRS Code
	Offens inDOT applica	Data	Section Accid Num	lent	,	r A Giante	THE		Interstate			☐ Safety Zone	and described the same	☐ Work Zone
Statute	Descri	ption (inc	lude the	e name of sta	tute or ordi G, DEVICE A	nance): DEL ND COSMET	IVE	RY O	F A CONT	FROLL	ED SU	BSTANCE: SECT	ION 7	/80-113 (A)(30)
did, as a	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 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.												iid controlled	
Inchoa Offens	Control Control	Attempt 18 901 A		Solicitation		onspiracy 903			Numbe	r of Vi	ctims A	ge 60 or Older		
	9	780-1		(A)(30)	of the	TITLE 35	Title		Counts	F	rade	NCIC Offense Co	nde	UCR/NIBRS Code
/if s	Offense nDOT I pplica	Data ole)	ection Accide Numb	er					nterstate			Safety Zone		☐ Work Zone
Statute	Descri	ption (inc	lude the LED SUI	e name of sta	tute or ordi G, DEVICE A	nance): DEL . ND COSMET :	IVE IC A	RY O CT)	F A CONT	TROLL	ED SU	BSTANCE: SECT	ION 7	/80-113 (A)(30)
did, as a included	principal n Sched	and/or acco	omplice, o PA Conti	deliver a controll	ed substance.	To Wit: FENT.	ANYL	to a	confident	tial info	ormatio	n (CI) with said co	ontrolle	February 3, 2021, ed substance being licensed by law to

Docket Number:	Date Filed:	ОТ	N/LiveScan Numb	er	Complaint/Incident Number BN3200109XM					
Defendant Name:	First: BRADLEY		Middle: ALLEN	Las		-				
<u>* 18 - 68 jarist 5 Epot 1941 - 19</u>						·				
					-					
Inchoate			onspiracy 8 903	Number o	f Victims A	ge 60 or Older				
□ 10 780		A)(30) of the	TITLE 35	1	F Grade	NCIC Offense Code	UCR/NIBRS Code			
Lead? Offense# PennDOT Data	Section S Accident Number -	Subsection	PA Statute (Title)	Counts Interstate		Safety Zone	☐ Work Zone			
(if applicable) Statute Description (incontrolled SUBSTANC	1. 1- 1- 2-22	of statute or ordi	nance): PROHIBIT	ED ACTS: POS	SESSION V	WITH INTENT TO D S, DEVICE AND COS	ELIVER A SMETIC ACT)			
Acts of the accused as	sociated with th	nis Offense: The de	efendant, Bradley Tru	mp, in Elliottsbu	rg, Perry Co	unty, did knowingly p February 4, 2021. Th	oossess with the ne said actor not			
intent to deliver a controlled then and there being registe by the appropriate State Boa	red under the Cont	rolled Substance, Dru	g, Device and Cosme	tic Act, Acto of	April 14, 197	2, or a practitioner re	egistered or licensed			
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Inchoate			onspiracy. 903	Number of	Victims Aç	e 60 or Older				
□ 11 780-)(30) of the	TITLE 35		Grade	NCIC Offense Code	UCR/NIBRS Code			
PennDOT Data	Section Su Accident Number —	ubsection	PA Statute (Title)	Counts Interstate		Safety Zone	☐ Work Zone			
(if applicable) Statute Description (in CONTROLLED SUBSTANC	-le-d- the name	of statute or ordi	nance): PROHIBIT	TED ACTS: POS OLLED SUBSTA	SESSION '	WITH INTENT TO E G, DEVICE AND COS	DELIVER A SMETIC ACT)			
Acts of the accused as	sociated with the	his Offense: The d	efendant, Bradley Tru	imp, in Elliottsbu	irg, Perry Co	ounty, did knowingly put February 4, 2021.	oossess with the The said actor not			
Acts of the accused associated with this Offense: The defendant, Bradley Trump, In Elliottsburg, 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										
then and there being register	red under the Con	trolled Substance, Dru	ag, beties and coom	elic Act, Acto or	April 14, 19,	72, or a practitioner to	egistered or licensed			
then and there being registe by the appropriate State Bo	red under the Con	trolled Substance, Dri	ag, perice and cosmi	elic Act, Acto or	аргіі 14, 19 <i>,</i>	z, or a practitioner to	egistered or licensed			
then and there being register	red under the Con	trolled Substance, Dru	ag, perice and cosm.	euc Act, Acto or	Аргіі 14, 1 3.	z, or a practitioner in	egistered or licensed			
then and there being register	pt So	nlicitation	Conspiracy 8 903	Suc Act, Acto of	npi i 11, 22,	Age 60 or Older	egistered or licensed			
then and there being registe by the appropriate State Box Inchoate	pt Sc	plicitation	Conspiracy 8 903	Number	of Victims A	Age 60 or Older				
Inchoate Attem Offense 18 901 Lead? Offense# PennDOT Data	pt Sc A 18 0-113 (Section Accident	plicitation 02 A 1	Conspiracy 8 903	Number	of Victims A	2, or a practitioner	UCR/NIBRS Code			
Inchoate Attem Offense 18 901 Lead? Offense# PennDOT Data (if applicable)	pt Sc 18 -113 (Section Number	A)(30) of the	Conspiracy 8 903 TITLE 35 PA Statute (Title)	Number 1 Counts Interstate	of Victims A	Age 60 or Older	UCR/NIBRS Code Work Zone DELIVER A			
Inchoate Attem Offense 18 901 Lead? Offense# PennDOT Data (if applicable) Statute Description (incontrolled Substance)	pt Socion Accident Number Clude the name Se: SECTION 780	A)(30) of the Subsection or ord	TITLE 35 PA Statute (Title) inance): PROHIBIT 64 (THE CONTRO	Number Counts Interstate TED ACTS: POOLLED SUBSTA	F Grade	NCIC Offense Code Safety Zone WITH INTENT TO I	UCR/NIBRS Code Work Zone DELIVER A SMETIC ACT) DOSSESS With the			
inchoate Attem Offense 18 907 Lead? Offense# PennDOT Data (if applicable) Statute Description (in CONTROLLED SUBSTANCE) Acts of the accused as intent to deliver a controlled and there being registered of the accused as intent to deliver a controlled and there being registered of the accused as intent to deliver a controlled and there being registered of the accused as intent to deliver a controlled and there being registered of the accused as intent to deliver a controlled and there being registered of the accused as intent to deliver a controlled and there being registered of the accused as intent to deliver a controlled and there being registered of the accused as intent to deliver a controlled and there being registered of the accused as intent to deliver a controlled and there accused as intent to deliver a controlled and the accused as intent to deliver a controlled and the accused as intent to the accused as intent to the accused as	pt Sc A 18 0-113 (Section Accident Number, Clude the name Section Section T80 Section Accident Number, Clude the name Section T80 S	A)(30) of the Subsection e of statute or ord 1-113 (A)(30) OF AC his Offense: The d	TITLE 35 PA Statute (Title) inance): PROHIBIT T 64 (THE CONTRO	Number Counts Interstate TED ACTS: POOLLED SUBSTA	F Grade SSESSION NCE, DRUC	NCIC Offense Code Safety Zone WITH INTENT TO I G, DEVICE AND COSTONE MAY 19, 2021. The second	UCR/NIBRS Code Work Zone DELIVER A SMETIC ACT) possess with the said actor not then			
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Docket Number:	Date Filed:	: 01	OTN/LiveScan Number				Complaint/Incident Number BN3200109XM				
Defendant Name:	First: BRADLEY	Terrories de la constante de l	Middle: ALLEN	·)	ast: RUMP					
Inchoate	,		onspiracy 903		Number	of Victims	Age 60 or Older				
□ 13 780-1		A)(30) of the	TITLE 35			F	NCIC Offense Code	LICONNIPO Code			
Lead? Offense# S PennDOT Data (if applicable)	ection 5 Accident - Number -	Subsection	PA Statute (Title)		Counts nterstate `	Grade_	☐ Safety Zone	UCR/NIBRS Code Work Zone			
Statute Description (inc	lude the nam	ne of statute or ordi 0-113 (A)(30) OF AC	nance): PROHII T 64 (THE CON T	BITED ROLL	ACTS: PC	SSESSIO ANCE, DR	N WITH INTENT TO UG, DEVICE AND C	DELIVER A DSMETIC ACT)			
Acts of the accused associated with this Offense: The defendant, Bradley Trump, in Elliottsburg, 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 sald 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 ☐ Attemp Offense 18 901 A	I —		Conspiracy 8 903		Number	of Victim	s Age 60 or Older _				
□ 14 7512	. /	A of the	TITLE 18		1	F3					
PennDOT Data	Section Accident	Subsection	PA Statute (Title		Counts Interstate	Grade	NCIC Offense Cod Safety Zone	e UCR/NIBRS Code ☐ Work Zone			
(if applicable) Statute Description (incl OF TITLE 18, PA CRIMES C		e of statute or ordi	nance): CRIMIN	IAL U	SE OF A CO	OMMUNI	CATION FACILITY: S	SECTION 7512 (A)			
Acts of the accused ass namely a cellular telephone, to 2021 and May 19, 2021, which	o arrande transa	actions of Methampheta	amine and/or Heroi	n/Fent	anyl and/o	r Marijuan	a between the time fra	ime of January 14,			
				٦							
Inchoate			onspiracy 903		Number	of Victims	Age 60 or Older				
		of the	DA CIALLA (TIVA)		Counts	Crada	NCIC Offense Code	UCR/NIBRS Code			
Lead? Offense# So PennDOT Data (if applicable)	Accident S Number -	Subsection	PA Statute (Title)	☐ In	Counts terstate	Grade [☐ Safety Zone	☐ Work Zone			
Statute Description (incl	Annual Control of the Control of the Control	e of statute or ordi	nance):								
Acts of the accused ass	ociated with t	this Offense:				•					
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Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First:	Middle:	Last:
	BRADLEY	ALLEN	TRUMP

- 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 that non-confidential information and documents.

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

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

(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.

(Magisterial District Court Number)

(Issuing Authority)

SEAL

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

Sworn to me and subscribed before methis

Date

Date

My commission expires first Monday of January, 2014

SEAL

COMMON VENTTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 MDJ: Hon. Elizabeth R. Frownfelter (NAME and ADDRESS): Address: 3553 Shermans Valley Road **CHELSEY** MEGAN ANDREWS First Name Loysville, PA 17047 Middle Name Last Name Ge 2867 County Line Road Telephone: (717)789-4117 Riegelsville, PA 18077 **NCIC Extradition Code Type** 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Mişdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION **Docket Number** Date Filed Request Lab OTN/LiveScan Number Complaint/Incident Number Services? パー430ーと1 8129121 168968 - Z ☐ YES ☐ NO BN3200109XM GENDER ров 12/08/1984 POB Add'l DOB Co-Defendant(s) ☑ Male First Name Middle Name Last Name Gen. ☐ Female **AKA** RACE ☑ White Asian Black Native American Unknown ETHNICITY ☐ Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair ☐ BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) Eye GRN (Green) GRY (Gray) Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number 347289FH8 MNU Number 120 ☐ YES ☐ NO Defendant Fingerprinted Ft. HEIGHT In. Fingerprint Classification: 4 **DEFENDANT VEHICLE INFORMATION** Haz Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Reg. Plate # mat Ind. Sticker (MM/YY) same as Def. VIN Year Make Model Style Color (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 08/22/2021 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) AGENT KURT ZITSCH BNIDC - #621 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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)

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

OPC 412A - Rev. 7/18

in PERRY County

1501

(County Code)

Page 1 of



1 1 A				POL			COMPLAIN
Docket Number:	Date Filed: / /	OTN/LiveSc	an Number			int/Incident I 0109XM	Number
Defendant Name:	First: CHELSEY	Middle: MEGAN	•	Last AND		0100/44	
<u>a partir de la companya de la compa</u>							
The acts committed by When there is more tha (Set forth a <i>brief</i> summary of without more, is not sufficier The age of the victim at the the listed. If the identity of an	in one offense, ea the facts sufficient to it. In a summary case ime of the offense ma	ich offense should be r advise the defendant of the you must cite the specific s y be included if known. In ad	numbered che nature of the o ection(s) and se dition, social se	ronologica ffense(s) cha ubsection(s) ecurity numb	ally. erged. A cita of the statu ers and fina	ition to the stat ite(s) or ordinar	ute(s) allegedly violated ace(s) allegedly violated
Inchoate	☐ Solicita 18 902	_ , ,		Nu	mber of Vio	ctims Age 60 o	r Older
☑ 1 911	(B)(3)	of the TITLE	18 1	F1			
Lead? Offense Se	ction Subsec	ion . PA Statu	ite (Title) C	ounts (Grade N	VCIC Offense Code	UCR/NIBRS Code
PennDOT Data // (if applicable)	Accident Number	· · ·	☐ Inter	state	☐ Sa	fety Zone	☐ Work Zone
	lude the name of	statute or ordinance): c	CORRUPT ORG	ANIZATIO	NS		
Inchoate Act. 35 P.S. § 780-1 Attempt 18 901 A	13(a) (30), specifical	tion	to, the offenses			nt. tims Age 60 o	r Older
☐ 2 911	(B)(A)	of the TITLE 1	.8 1	F1	1		44-34
	(B)(4)	and a second			irade N	ICIC Offense	UCR/NIBRS Code
PannDOT Data	ccident Number	77, 51010	1			. Code	_
(if applicable) Statute Description (incl		ataluta ar ardinanaa). 5	Inter	<u> </u>		fety Zone	Work Zone
Acts of the accused asselsewhere, conspire to violate during the periods as set forth conspire and agree with other conduct or participate, directly 11(h), in violation of Section Controlled Substance, Drug. D	the provisions of Sec herein, Defendant, we individuals, that they or indirectly, in the of 911(b)(4) of the Crim device and Cosmetic A	tion 911(b)(3) of the Crimes with the intent of promoting of , or one or more of them, who onduct of the affairs of the es Code, 18 Pa.C.S. § 911(bct, 35 P.S. § 780-113(a) (30)	Code, 18 Pa.C.: or facilitating the hile employed be enterprise throu)(4). The patte).	S. § 911(b)(3 e commission y or associat gh a pattern ern of racket	i), pertainingi) of the crimed with theof racketeeeering consideration	g to Corrupt Or ne of Corrupt Or enterprise set f ring activity as ists of multiple	ganizations, that Is, rganizations, did orth herein, would defined in 18 Pa.C.S. § acts of violation of the
Inchoate Attempt Offense 18 901 A				Number of \	/ictims Age	60 or Older	
☐ 3 780~:	1 \ / \	regular control of the control of th		F	Crod-	NOIC Off	1,004,0550
Lead? Offense# S PennDOT Data (If applicable)	Accident Subse	ction PA Statu		Counts erstate		NCIC Offense Co Safety Zone	UCR/NIBRS Code
Statute Description (inclusion Controlled Substance, DRUG. DEVICE AND COSMINACTS of the accused assorted and constitutes a crime or diuch crime, that is, at various likolaus Andrews, Oksana Recommend of them, would engage	DRUG, DEVICE, AND COLOR OF THE ACT COLOR	DCOSMETIC ACT, SECTION OF THE PROPERTY OF THE	ON 780-113 (2020, and May other persons the lanning or commere, Defendant Barry Melhorn, Controlled Subs	A)(30) OF A 19, 2021, the nat they or o nission of sur did agree w Michael Row stance Drug,	Defendant ne or more ch crime or rith Robert F ello, Scott R Device and	, Chelsey Andre of them would of an attempt of fowler, Anthony Reabuck, and ot Cosmetic Act, 3	ews, with the Intent of engage in conduct or solicitation to commit Leming, Marc Bankes, hers,; that they, or one 35 P.S. § 780-113(a)

AOPC 412A - Rev. 7/18

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POLIC	F CRIMINAL	COMPLAIN

Docket	t Numbe	r:	Date	Filed:		ОТ	N/LiveScar	n Num		district L.		Com	plaint/Incident N		
	·	Articles	/ First:			— Т	Middle:			1 1	_ast:	BN3	200109XM	-	
Defend	iant Nam	ie:	CHEL	SEY			MEGAN			1	ANDR	EWS	5		
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Incho Offen		Attempt 18 901 A	`	☐ Solicit 18 902			onspiracy 903			Number	of Vict	ims A	Age 60 or Older _		<u>. </u>
	4	780-1	13	(A)(3	30)	of the	TITLE 35		1		F				
டப் Lead?	Offenset		ection	Subse	<i>J</i> 38		PA Statute		1 -	Counts .	Gra	de	NCIC Offense Cod	le	UCR/NIBRS Code
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Statute	Descri	otion (inc	lude the	e name of						A CONT	ROLLE	D SU	BSTANCE: SECTI	ON 78	0-113 (A)(30)
OF ACT	64 (THE	CONTROL	LED SU	BSTANCE,	DRUG, D	DEVICE A	ND COSMET	ric ac	T)				-		
Acts of	the acc	used ass	ociated	l with this	Offens	e: The de	efendant, Che	elsey A	ndrev	vs, within	Carlisle	, Cum	berland County, on	or abo	out January 15,
with said	l controlle	d substance	e being in	icluded in S	chedule I	I of the P	A Controlled :	c: Me: 11 Substar	nce, [Drug, Devi	ice and	Cosm	vania State Police a netic Act of 1972, w	ith saic	defendnat not
being au	ithorized o	r licensed b	y law to	possess sal	d controll	led substa	nce.								·
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Incho	nen l	☐ Attemp	<u> </u>	Solici	fation	ППС	onspiracy			Memobo	- of \/!		Ann 60 or Oldor		
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F-1	5	780-	112	(0)	20)	of the	TITLE 3	<u></u>		1	F		•	1	
Lead?	Offense		Section	(A)(section		PA Statute			Counts		ade	NCIC Offense Co	de	UCR/NIBRS Code
Per	nnDOT [)ata	Accid Numi	Site Color to		-				nterstate		. [☐ Safety Zone		☐ Work Zone
Statute	applicat Descrip	otion (incl	ude the	name of	statute	or ordi	nance): DE	LIVER	Y OF	A CONT	ROLLE	D SU	BSTANCE: SECTION	ON 78	0-113 (A)(30)
OF ACT	64 (THE	CONTROL	LED SUE	STANCE,	DRUG, D	EVICE A	ND COSMET	FIC AC	T)						
Acts of	the acc	used ass	ociated	with this	Offens	e: The de	efendant, Che	lsey Ar	drew	s, within	Carlisle	, Cum	berland County, on	or abo	out January 15,
2021, die controlle	d, as a prii d substand	ncipal and/o ce being ind	or accomp cluded in	plice, delive Schedule II	r a contro of the Pa	olled subs A Controll	tance, To Wit ed Substance	: FENT , Drug,	ANYL Devi	., to Penn: ice and Co	sylvania osmetic	Act o	e Police Trooper We f 1972, with said de	es John Efendna	son, with said at not being
authorize	ed or licens	sed by law	to posses	ss said conti	rolled sub	ostance.									-
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incho: Offen		18 901 A		☐ Solicita 18 902			nspiracy 903			Number	of Vict	ims A	ge 60 or Older _		-
		1		(4)	·										
	6	780-1		(A)(3 Subse	- /	of the	TITLE 35 PA Statute		1	Counts	F	rfe	NCIC Offense Cod	·	UCR/NIBRS Code
	Offense# nDOT D	ata	ection Accide	nt 🦠	CHUIT		1 A Statute			terstate	.	······································	Safety Zone		Work Zone
(if	applicab	le)	Numbe		etatuto	or ordi	nance): nr				POLIF		-	1	
OF ACT	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	Acts of the accused associated with this Offense: The defendant, Chelsey Andrews, within Mechanicsburg, Cumberland County, on or about														
February	9, 2021, 6	did. as a pr	incipal an	id/or accom	plice, del	liver a cor	itrolled substa	ance, T	o Wit	: METHAN	MPHETA	AMINE	, to Pennsylvania S and Cosmetic Act of	tate Po	lice Trooper Wes
Jonnson,	with said	controlled :	substance	e nemy mon	raca iti 2	cucuuie I	TOLUKE LA C	いい いほし	u JUl	volatile, b	nuy, D	CAICE	una cosmetic Act O	13/2	mui adiu
defendna	at tiot bein	y audionic	d or licer	nsed by law	to posse	ss said co	ntrolled subsi	tance.							,
defendna	at not bein	y autionze	d or licer	nsed by law	to posse	ss said co	ntrolled subsi	tance.						,	. •

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Docket Number:	Date Filed:	OTN/LiveScan N		Complaint/Incident Null BN3200109XM	
Defendant Name:	First: CHELSEY	Middle: MEGAN	Last:		
Inchoate ☐ Attempt Offense 18 901 A		Conspiracy 18 903	Number of V	ictims Age 60 or Older	
□ 7 7512		of the TITLE 18	1 F3	1	
Lead? Offense# S PennDOT Data	Section Subsection Accident	PA Statute (Titi		Grade NCIC Offense Code	UCR/NIBRS Code
(if applicable)	Number ——		☐ Interstate	☐ Safetý Zone	☐ Work Zone
OF TITLE 18, PA CRIMES	lude the name of statul CODE	te or ordinance); CRIM	INAL USE OF A COMI	MUNICATION FACILITY: S	ECTION 7512 (A)
Acts of the accused ass communication device, name 15, 2021 and May 19, 2021, v	ly a cellular telephone, to arr	ange transactions of Metha	mphetamine and/or He	roin/Fentanyl between the tim	e frame of January
Inchoate		Conspiracy 18 903	Number of \	/ictims Age 60 or Older	P. Ori Marks
		of the			
Lead? Offense# PennDOT Data	Section Subsection Accident	PA Statute (Ti		Grade NCIC Offense Code	UCR/NIBRS Code
(if applicable)	Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (incl	ude the name of statuti	e or ordinance):			•
Acts of the accused ass	ociated with this Offens	se:			
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Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number of Vid	ctims Age 60 or Older	

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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Co
	inDOT Data applicable)	Acciden Number			☐ Interstate	Е] Safety Zone	☐ Work Zone
atute	Description	(include the	name of statute	or ordinance):				
ts of	the accuse	l associated	with this Offense	3*	, , , , , , , , , , , , , , , , , , ,	-		
ts of	the accused	d associated v	with this Offense);		·		
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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 $\underline{1}$ through $\underline{}$.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

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

(Date)

AND NOW, on this date

3/29/21

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

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

Sworn to me and subscribed before me this

Date

Date

My commission expires first Monday of January, 302/

SEAL

COMMONVEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 VS. MDJ: Hon, Elizabeth R. Frownfelter (NAME and ADDRESS): Address: 3553 Shermans Valley Road ALLEN BANKES MARC Middle Name First Name Last Name Loysville, PA 17047 Ge 3000 Old Berwick Road Bloomsburg, PA 17815 Telephone: (717)789-4117 NCIC Extradition Code Type C-Misdemeanor Surrounding States 1-Felony Full ☐ 5-Felony Pending Extradition ☐ Distance: ☐ D-Misdemeanor No Extradition 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab OTN/LiveScan Number Date Filed Complaint/incident Number **Docket Number** Services? R 168970-4 CR-431-21 8 129121 ☐ YES ☐ NO BN3200109XM Co-Defendant(s) ров 07/04/1976 Add'l DOB First Name Middle Name Last Name Gen. ☐ Female **AKA** Asian Black Native American Unknown RACE Unknown ETHNICITY Hispanic Non-Hispanic SDY (Sandy) PLE (Purple) BLU (Blue) BRO (Brown) GRY (Gray) RED (Red/Aubn.) Hair ONG (Orange) GRN (Green) ☐ WHI (White) XXX (Unk./Bald) PNK (Pink) BLK (Black) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye PNK (Pink) MAR (Maroon) Color HAZ (Hazel) XXX (Unknown) MUL (Multicolored) **DNA** Location WEIGHT (lbs.) DNA ☐ YES ☐ NO FBI Number 909617AE3 **MNU Number** 320 ☐ YES ☐ NO Ft. HEIGHT In. **Defendant Fingerprinted** Fingerprint Classification: 0 DEFENDANT VEHICLE INFORMATION Comm'l Veh. State Registration School Veh. Oth. NCIC Veh. Code Reg. Haz Ind. mat same Plate # Sticker (MM/YY) as Def. Year Make Modèl Style Color VIN 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 08/22/2021 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) BNIDC - #621 AGENT KURT ZITSCH (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (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)

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

in PERRY County

[50]

(County Code)

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Dock	et Numbe	er:	Date I	Filed:	. 0	TN/LiveSc	an Nun	ber	Con	DRIVINA plaint/Inciden 3200109XM	L COMPLAINT t Number
Defe	ndant Nan	ne;	First: MARC			Middle: ALLEN			Last: BANKES		
VVne (Set for without The ag be list	n there is orth a brief s ut more, is n ge of the vic led. If the idd	more tha summary of not sufficien tim at the til entity of an	n one of the facts s t. In a sum me of the c account m	fense, each sufficient to adv mary case, you offense may be ust be establisi	offense si ise the defer must cite ti Included if k ned, list only	nould be not	nature of ection (s)	ed chronol f the offense and subsect	ogically. (s) charged. A ion(s) of the s	citation to the statute(s) or ordin	Diated, if appropriate. atute(s) allegedly violated, ance(s) allegedly violated. tion (e.g. PINs) should not
Inch Offe	62 9088-1 Gr.	Attempt 18 901 A		☐ Solicitation 18 902 A		Conspiracy 8 903			Number o	f Victims Age 60	or Older
\boxtimes	1	911		(B)(3)	of the	TITLE 1	.8	1	F1		-
Lead?	. #		ction	Subsection		PA Statu	te (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
(if	nnDOT Da f applicabl	le) A	ccident Nu					Interstate	1	Safety Zone	☐ Work Zone
Statu	te Descri	otion (incl	ude the	name of stat	ute or ord	inance): c	ORRUP	r ORGANIZ	ATIONS		
is, duri engage particip is in vic	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. 6 780-113(a) (30), specifically to include, but not limited to, the offenses outlined in this complaint.										
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Incho Offer	- Section 1	Attempt 18 901 A		Solicitation 18 902 A		onspiracy 3 903			Number of	Victims Age 60	or Older
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Lead?	Offense#	Sect	tion	Subsection	The second second second	PA Statute		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
(if	nnDOT Da applicable	e) Ac	cident Nur	mber				Interstate		Safety Zone	☐ Work Zone
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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).

Inchos Offen	353333	Attempt 18 901 A	Solicitation 18 902 A	⊠ Conspiracy 18 903	,	Number o	f Victims	Age 60 or Older	
	3	780-113	(A)(30)	of the TITLE 35	5	1	F		
Lead?	Offense#	Section	Subsection	PA Statute	(Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	nDOT Da pplicable		757 N 2			Interstate	[☐ Safety Zone	☐ 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.

, t			PO	LICE CRIMINAL	COMPLAINT	
Docket Number:	Date Filed: / /	OTN/LiveScan Nun	iber	Complaint/Incident Number BN3200109XM		
Defendant Name:	First: MARC	Middle: ALLEN	La: BA	st: NKES		
Inchoate ☐ Attempt	C College			·		
Offense 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of	f Victims Age 60 or Older	. •	
4 780-1 Lead? Offense# Si		of the TITLE 35		F		
Lead? Offense# Si	ection Subsection Accident	PA Statute (Title)	Counts	Grade NCIC Offense Code	UCR/NIBRS Code	
(if applicable)	Number		Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (incl CONTROLLED SUBSTANCE Acts of the accused ass possess with the intent to deliactor not then and there being licensed by the appropriate States of the actor and the appropriate States of the actor and the propriate States of the actor and	: SECTION 780-113 (A)(30 Ociated with this Offense ver a controlled substance, nary registered under the Controllate Board.	OF ACT 64 (THE CONTR The defendant, Marc Bank mely, Methamphetamine, a S	os, in Bloomsburg chedule II Contro and Cosmetic Act	NCE, DRUG, DEVICE AND Cog and Berwick, Columbia Count of Substance, on or about Market of April 14, 1972, or a practice.	cy, did knowingly	
Offense 18 901 A		18 903	Number o	f Victims Age 60 or Older _		
☐ 5 780-1 Lead? Offense# S	.13 (A)(30) ection Subsection	of the TITLE 35		F		
PennDOT Data	Accident	PA Statute (Title)	Counts Interstate	Grade NCIC Offense Cod	1	
(if applicable)	Number -		_	☐ Safety Zone	☐ Work Zone	
Statute Description (inclucent controlled substance:	SECTION 780-113 (A)(30)	OF ACT 64 (THE CONTRO	LLED SUBSTAN	ICE, DRUG, DEVICE AND CO	SMETIC ACT)	
Acts of the accused assot to deliver a controlled substance registered under the Controlled State Board.	e, nameiv, Marijuana, a Sched	iule I Controlled Substance.	or about May 1	19 2021 The said actor not ti	non and those bains	
	, .					
Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number of \	Victims Age 60 or Older	•	
7512	1 4					

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)

TITLE 35 18

PA Statute (Title)

F.3

Grade

NCIC Offense Code

☐ Safety Zone

Counts

☐ Interstate

(A)(30)

Accident

Number

Subsection

6

Offense#

PennDOT Data

(if applicable)

UCR/NIBRS Code

☐ Work Zone

, '			10. - Albert (. •	, 	_
Docket Number:	Date Filed:	0	TN/LiveScan Number		Complaint/incident Number BN3200109XM	
Defendant Name:	First: MARC		Middle: ALLEN	Last:		

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

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

(Issuing/Authority)

(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.

4/- 3 - 05 (Magisterial District Court Number)

SEAL

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

	-/_/	#67
(Sig	mature of Affiant)	11000
Sworn to me and subscribed before me this day of flague	£ 0	2021
Date Date Magiste	erial District Judg	je
My commission expires first Monday of January, 2724.	,]
	SEAL	
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COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 VS. MDJ: Hon, Elizabeth R. Frownfelter (NAME and ADDRESS): Address: 3553 Shermans Valley Road **DOUGLAS FARNER** First Name Middle Name Last Name Loysville, PA 17047 104 Wayne Avenue Enola, PA 17025 Telephone: (717)789-4117 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION. Request Lab **Docket Number** Date Filed OTN/LiveScan Number Complaint/Incident Number Services? CR-420-21 129121 ☐ YES BN3200109XM **GENDER** ров 5/1/1977 POB Co-Defendant(s) Add'i DOB ☑ Male First Name Middle Name Last Name Gen. ☐ Female **AKA** RACE White ■ Asian ☐ Black Native American Unknown ETHNICITY Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair ☐ BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number 584036MC4 **MNU Number** 235 Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 1 **DEFENDANT VEHICLE INFORMATION** State Registration Comm'l Veh. School Veh. Oth. NCIC Veh. Code Haz Reg. Ind. mat Plate # same Sticker (MM/YY) as Def. VIN Year Make Model Style Color Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG ROBERT SMULKTIS 08/22/2021 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) I, AGENT KURT ZITSCH BNIDC - #621 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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 (Place-Political Subdivision) in PERRY County [50] on or about JULY 23, 2020 TO MAY 19, 2021 (County Code)

Docket Number:	Date Filed:	OTN/LiveScan Number	POLICE CRIMINAL COMPLAINT Complaint/Incident Number
Docket Mailiber	/ /	OTHERESCAL MUNICE	BN3200109XM
	First:	Middle:	Last:
Defendant Name:	DOUGLAS		FARNER
			ssembly or statute allegedly violated, if appropriate.
When there is more that (Set forth a brief summary of without more, is not sufficien The age of the victim at the ti	n one offense, each the facts sufficient to adv t. In a summary case, you me of the offense may be	offense should be numbered chi ise the defendant of the nature of the of must cite the specific section(s) and su	ronologically. ffense(s) charged. A citation to the statute(s) allegedly violate ubsection(s) of the statute(s) or ordinance(s) allegedly violate ecurity numbers and financial information (e.g. PiNs) should n

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.

TITLE 18

PA Statute (Title)

1

☐ Interstate

Counts

F1

Grade

NCIC Offense

Code

☐ Safety Zone

UCR/NIBRS Code

☐ Work Zone

ncho Offe	50 CO 10 CO	Attempt 18 901 A	Solicitation 18 902 A		onspiracy 3 903		Number of	Victims Age 60 o	Older
	2	911	(B)(4)	of the	TITLE 18	1	F1		······································
ead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
1000	nnDOT E applicat	A COMENT	Number	-		Interstate		Safety Zone	☐ Work Zone

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).

	nchoate				onspiracy 903	Number	of Victims	Age 60 or Older	
	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
14.34 (17.74)	nDOT Dat pplicable	おおと (1) 4 Paris 10 Each (2分) かっぱき	7.3 S. T. V. H			☐ Interstate		Safety Zone	☐ Work Zone

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 Farner, 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 maritiuana), and in pursuance of such conspiracy one or more overt acts were committed.

911

Section

Accident Number

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Lead?

1 Offense

PennDOT Data

(B)(3)

Subsection

of the

				A P	POLICE CRIMINAL	COMPLAINT
Docket Number:	· Date	Filed:	OTN/LiveScan	Number	Complaint/Incident Nu BN3200109XM	
Defendant Name:	First:	GLAS	Middle:	٧.	Last: FARNER	
		÷			,	
	ttempt 3 901 A	☐ Solicitation 18 902 A	Conspiracy 18 903	Numbe	r of Victims Age 60 or Older	
Lead? Offense#	7512 Section	A Subsection	of the TITLE 18	1 Counts	F3 Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accide Numb	int er ———		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Descriptio OF TITLE 18, PA CR	n (include the IMES CODE	e name of statut	e or ordinance): cr i	MINAL USE OF A	COMMUNICATION FACILITY: 5	SECTION 7512 (A)
device, namely a cellul	ar telephone, to	arrange transaction	is of Methamphetamine a	ind/or Heroin/Fenta	Perry County, and elseshwere, did inyl and/or Marijuana between the vania Crimes Code, as amended, 1	time frame of April 7.
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		T		· ·		
	attempt 8 901 A	Solicitation 18 902 A	Conspiracy 18 903	Numbe	er of Victims Age 60 or Older	
Lead? Offense#	Section	Subsection	of the 1/2 PA Statute	(Title) Counts	Code NOIC Offeren Cod	
PennDOT Data (if applicable)		ent	PA Statute	☐ Interstate	Grade NCIC Offense Cod	UCR/NIBRS Code Work Zone
Statute Description	(include the	name of statute	e or ordinance):		•	
Acts of the accuse	d associated	with this Offens	se:			
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Lead? Offense#	Section Accider Numbe	Subsection	PA Statute (T	tle) Counts	Grade NCIC Offense Code	UCR/NIBRS Code Work Zone
Lead? Offense#	Accider Numbe	Subsection	PA Statute (Ti			

	POLICE	CRIMINAL	COMPL	AIN7
44.00	PULIUE	CKIMINAL	COMPL	.AIIN

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

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

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

(Issuing Authority)

(Date)

(Year)

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)

SEAL

Docket Number:	ocket Number: Date Filed:		Complaint/incident Number BN3200109XM
	First:	Middle:	Last:
Defendant Name:	DOUGLAS	, ·	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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	L~ #6	153
	nature of Affiant)	
Sworn to me and subscribed before me this day of Hugue		21
Date Shahle Nowelle, Magiste	erial District Judg	e .
My commission expires first Monday of January, 2014		. ·
	SEAL	: -

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: PERRY Magisterial District Number: 41-3-05 MDJ: Hon. Elizabeth R. Frownfelter Address: 3553 Shermans Valley Road R

POLICE CRIMINAL COMPLAINT **COMMONWEALTH OF PENNSYLVANIA** VS.

(NAME and ADDRESS): ,

OBERT	WESLEY	FOWLER
irst Name	Middle Name	Last Name

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					INAL COMPLAINT
Docket Number:	Date Filed: / /	OTN/LiveScan I	Number	Complaint/In BN3200109	cident Number 9XM
Defendant Name:	First: ROBERT	Middle: WESLEY		ast: FOWLER	
·					
When there is more that (Set forth a brief summary of without more, is not sufficien	n one offense, each of the facts sufficient to advi t. In a summary case, you me of the offense may be	offense should be num ise the defendant of the natu must cite the specific section included if known. In addition	bered chronologue of the offense(s) on(s) and subsection, social security n	gically. charged. A citation to n(s) of the statute(s) o umbers and financial	odly violated, if appropriate. o the statute(s) allegedly violated, ir ordinance(s) allegedly violated. information (e.g. PINs) should not
Inchoate	☐ Solicitation 18 902 A	Conspiracy 18 903	·	Number of Victims	Age 60 or Older
☑ 1 911	(B)(3)	of the TITLE 18	1	F1	
#	ction Subsection	PA Statute (T	itle) Counts	Grade NCIC O	TICD/MIDDE CARA
PennDOT Data (if applicable)	ccident Number	_	☐ Interstate	☐ Safety Zo	one
Statute Description (incl	ude the name of stat	ute or ordinance): cor	RUPT ORGANIZA	TIONS	
indirectly, while being employ is, during the periods as set for	ed by or associated with a orth herein, within the Cou I substances (methamphel airs of said enterprise thro 11 (B) (3). The pattern of	n enterprise, in the conduct nty of Perry, Pennsylvania a amine and/or heroin/fentan ugh a pattern of racketeerin racketeering consists of mul	of such enterprise's nd elsewhere, while yl and/or marijuana g activity as defined tiple acts of violatio	a affairs through a patt e employed byor assoc) with the intent to dis in Title 18 Pa.C.S. § 9 on of the Controlled Su	bstance, Drug, Device and
☐ 2 911 Lead? Offense# Sec	(B)(4)	Of the TITLE 18 PA Statute (Ti		F1 NCIC OF	
PennDOT Data	ccident Number	·	☐ Interstate	Cod ☐ Safety Zo	e
(if applicable) Statute Description (incl		ute or ordinance): cor	RUPT ORGANIZAT	,	
herein, would conduct or parti 18 Pa.C.S. § 911(h), in violatio violation of the Controlled Sub	conspire to violate the provine periods as set forth her did agree with other individual cipate, directly or indirectly of Section 911(b)(4) of	visions of Section 911(b)(3) arein, Defendant, with the intuals, that they, or one or moy, in the conduct of the affaithe Crimes Code, 18 Pa.C.S. Cosmetic Act. 35 P.S. § 780-	of the Crimes Code, ent of promoting or them, while e rs of the enterprise § 911(b)(4). The 113(a) (30).	18 Pa.C.S. § 911(b)(3 facilitating the commitments of the commitments	i), pertaining to Corrupt ission of the crime of Corrupt ted with the enterprise set forth acketeering activity as defined in g consists of multiple acts of
Inchoate	18 902 A	☐ ☐ Conspiracy 18 903	Number	of Victims Age 60 or	Older
3 780-1		of the TITLE 35	. 1	F NOIC O	ffance C. J. HODWINDS O.
Lead? Offense# S PennDOT Data (if applicable)	Accident Subsection Number ———	PA Statute (T	itle) Counts Interstate	Grade NCIC O	ffense Code UCR/NIBRS Code Zone
Statute Description (inclucent Controlled Substance, DRUG, DEVICE AND COSME Acts of the accused assopromoting or facilitating the column of th	DRUG, DEVICE, AND CO TIC ACT) iciated with this Offer minission of a crime, did a d agree to aid such other p ocations in Perry County, F is Priar, Bradley Trump, Ch would engage in conduct of	DSMETIC ACT, SECTION 2 ISE: Between July 23, 2020 gree with one or more other person or persons the plannic Pennsylvania and elsewhere, nelsey Andrews, Douglas Far constituting multiple violation	, and May 19, 2021 persons that they ng or commission o Defendant did agre mer, Barry Melhorn, as of the Controlled	the Defendant, Rober or one or more of ther f such crime or of an a see with Anthony Lemin Michael Rowello, Scot Substance Drug, Devic	rt Fowler, with the intent of m would engage in conduct attempt or solicitation to commit g, Marc Bankes, Nikolaus t Reabuck, and others,; that the end Cosmetic Act, 35 P.S. §

AOPC 412A - Rev. 7/18

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Docket	: Numbe	r:	Date /	Filed:		01	'N/LiveScar	1 NU	mbei		Complaint/Incident Number BN3200109XM				
Defend	lant Nan	le:	First: ROBE	RT			Middle: WESLEY			J	Last: FOWLER				
Secretaria de la consecución del la consecución del la consecución de la consecución															
Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 Number of Victims Age 60 or Older															
	4	780-113 (A)(30) of the TITLE 35 1 F				F ,	•								
Lead?	Offense		ection		ection		PA Statute	(Title)	·	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
Tel. 2 4.5 C 100 C	nnDOT [applical	the second section of the second section is	Accide Number							nterstate] Safety Zone	☐ Work Zone		
Statute	Descri	otion (inc	lude the	name o	f statute	or ordi	nance): DE	LIVE	RY O	F A CONTI	ROLLED SU	BSTANCE: SECTIO	N 780-113 (A)(30)		
OF ACT	64 (THE	CONTROL	LED SU	STANCE,	DRUG, DI	EVICE A	IND COSMET	FIC A	CT)				·		
Acts of	the acc	used ass	ociated	with this	Offense	: The d	efendant, Rob	ert F	owler	, within Har	risburg, Dau	phin County, on or al	out July 23, 2020,		
did, as a	principal e being ir	and/or acco	omplice, d chedule I	leliver a cor I of the PA	ntrolled su Controlled	bstance, I Substai	To Wit: MET nce. Drug. De	HAME vice a	PHETA and C	MINE, to a esmetic Act	confidential of 1972, wi	information (CI) with h said defendant not	said controlled being authorized or		
licensed	by law to	possess sai	d control	ed substan	ce.	, oabota,	ico, brag, ba	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,						
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		•				•						•	•		
Incho	ate	☐ Attemp	<u> </u>	☐ Solic	itation		Conspiracy			Number	r of Victims	Age 60 or Older			
Offer	ıse	18 901 A	1	18 90	2 A	1	8 903								
□ .	5	780-	113	(A)	(30)	of the	TITLE 3	5		1	F	No.			
Lead?	Offens		Section	Sub	section	Name of the Control o	PA Statute	e (Title	;)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
	nnDOT.l applica		Accid Numb	Sec. 305 (Sec. 3)						Interstate		☐ Safety Zone	☐ Work Zone		
Statute	Descri	otion (incl	ude the	name o	fstatute	or ordi	nance): DE	LIVE	RY O	F A CONT	ROLLED SU	BSTANCE: SECTION	1 780-113 (A)(30)		
OF ACT	64 (THE	CONTROL	LED SUE	STANCE,	DRUG, DI	EVICE A	ND COSMET	IC A	CT)		•				
Acts of	the acc	used ass	ociated	with this	Offense	: The do	efendant, Rob	ert F	owler,	within Mill	erstown, Per	ry County, on or abou	ıt August 4, 2020, did,		
as a princ	cipal and/	or accompli	ce, delive	r a controll	ed substan	nce, To \	Nit: METHAM	PHET	AMIN	E, to a conf	idential info	mation (CI) with said endant not being auth	controlled substance		
law to po	suaea in : ssess said	d controlled	substanc	e.	Substance	, Druy,	pevice and Ci	J2111C	iic Aci	. OF 13/2, W	au sala acre		onzed of ficerised by		
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Incho	ate	Attempt	· [☐ Solicit	ation	□ Cc	nspiracy			Number	of Victims A	ge 60 or Older			
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<u></u>	6	780-1	12	(A)(3	30)	fthe	TITLE 35			1	F				
Lead?	Offense	1	ection	Subse			PA Statute		-	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
Pén	nDOT D	ata	Accide	nt					П	nterstate		Safety Zone	☐ Work Zone		
(if a	applicat	le)	· Numbe			or and:	nanės): ==								
Statute OF ACT	Descri) 64 (THE	otion (incl control	uge the L ED SU B	name of STANCE, I	statute DRUG, DE	or ordi	nance): DE . <mark>ND COSMET</mark>	IC Y	KY O CT)	r A CONTI	เบเเะม 5 0	BSTANCE: SECTION	1 /8U-113 (A)(3U)		
	•									within Carl	isle. Cumbe	land County, on or at	out January 15		
2021, did	l, as a pri	ncipal and/o	or accomi	lice, delive	r a control	led subs	tance, To Wit	: MET	THAM	PHETAMINE	E, to Pennsyl	vania State Police Tro	oper Wes Johnson,		
with said	controlle	d substance	being in	cluded in Se	chedule II	of the P.	A Controlled S	Substa	ance,	Drug, Devi	ce and Cosm	etic Act of 1972, with	said defendant not		
peing aut	norized o	r licensed b	y Iaw to	Jossess Sale	u controlle	u suusta	HICE,						İ		

Docket	Oocket Number: Date Filed: OTN/LiveScan Number						Complaint/Incident Number BN3200109XM							
Defenda	ant Nam	е:	First:	RT	· · · · · · · · · · · · · · · · · · ·		Middle: WESLEY			I .	Last: FOW	LER		
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oliva dien Gro	Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older													
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. 🗆	7	780-1	.13	(A)(30)	of the :	TITLE 35	 j		1	F	1		
Lead?	Offense#		ection		Subsection		PA Statute	(Title		Counts	G _I	rade	NCIC Offense Code	UCR/NIBRS Code
. (if a	nDOT D ipplicab	le).	Accide Numb	er .						Interstate			Safety Zone	☐ Work Zone
Statute	Descrip	tion (inc	lude the	e nam	e of statu	te or ordi	nance): DE	LIVE	ERY (OF A CONT	TROLL	.ED SUI	BSTANCE: SECTIO	N 780-113 (A)(30)
2021, did	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 Weş 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.													
			•			-				1				
Incho Offen	Saggiolegy (Co.)	Attemp 18 901 A		ı — -	Solicitation 8 902 A		onspiracy 3 903			Numb	er of V	ictims /	Age 60 or Older	
	8	780-	113		(A)(30)	of the	TITLE 3			1	F	***		
	Offense nDOT D	ata	Section Accid	Address of the second	Subsection		PA Statute	∋ (Title		Counts Interstate		Grade	NCIC Offense Cod	UCR/NIBRS Code Work Zone
(if a	applicab Descrip	i le) ition (incl	Numl		e of statut	e or ordi	nance): DE	LIVE					•	N 780-113 (A)(30)
Acts of 9, 2021; o	the accu lid, as a p	used ass principal an I substance	ociated d/or acco	l with omplice icluded	this Offen	se: The de ontrolled su II of the Pa	bstance, To V A Controlled S	ert F Nit: 1	owler METH	AMPHETAN	MINE, t	to Penns	sylvania State Police	on or about February Trooper Wes Johnson, a sald defendant not
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Inchoa Offens	2	Attempt 18 901 A			licitation 902 A		nspiracy 903			Number	r of Vid	ctims A	ge 60 or Older	·
	9	780-1	13	(/	A)(30)	of the	TITLE 35			1	F			
Lead?	Offense#		ection		Subsection	1 habitar na mineral distriction of the	PA Statute	(Title)		Counts	Gr	ade	NCIC Offense Code	UCR/NIBRS Code
(if a	nDOT Da pplicabl	e)	Accide Number	ar 🤃 -						Interstate			Safety Zone	☐ Work Zone
Statute OF ACT 6	Descrip 4 (THE 0	tion (incl	ude the	nam SSTAN	e of statut CE, DRUG,	e or ordii DEVICE A	nance): DE I ND COSMET	IC A	RY (F A CONT	ROLL	ED SUE	STANCE: SECTION	i 780-113 (A)(30)
did, as a p	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, lid, 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 aw to possess said controlled substance.													

Docket	Number	:	Date F	iled:		ОТ	N/LiveScan	Numb		r Oi		plaint/incident N		
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Defend	ant Nam	9:	First: ROBER			I .	Middle: WESLEY			Last: FOWLER				
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L Lead?	10 Offense	780-	L13 Section		(30) section	or trie	PA Statute		1 Count		Grade	NCIC Offense Co	de	UCR/NIBRS Code
	inDOT D		Acciden		Section		1 A Gladice	<u> </u>	Intersta			Safety Zone		☐ Work Zone
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												Perry County, did I		
the intent	to delive	controlled	substance:	s. namely	. Metha	mohetamin	e, a Schedule	II Conti	olled Sub	stance	, on or ab	out April 3, 2021.	The sa	id actor not then
and there	being reg	istered un	der the Con	trolled St	ibstance	e, Drug, De	vice and Cosm	ietic Act	, Acto of	April 14	4, 1972, o	r a practitioner regi	stered	or licensed by
the appro	priate Sta	te board.				•								
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Inchoa	ia I	Attempt	· · · · · · · · ·	Solicita	ation	Псо	nspiracy	\neg	Mirrord		/intima A	as 60 as Oldos		·
Offens	90,03900	18 901 A		18 902			903	ļ	Numa	er or v	/ICUINS A	ge 60 or Older		_
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L	11 Offense#	780-1	13 ection	(A)(3 Subse		of the	TITLE 35 PA Statute (1	Citle)	1 Counts	F	Grade	NCIC Offense Code		UCR/NIBRS Code
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(if a	pplicabl	e) :: :	Number	<u> </u>		0 0 0 0 rdir	anno): PDO					WITH INTENT TO		
CONTRO	Descrip	IION, (INCI BSTANCE:	ude the n : SECTION	iame or 1 780-11	รเลเนเ 3 (A)(3	e or ordir 8 0) OF AC 1	тансе). Р ко Г 64 (ТНЕ СО	NTROL	LED SUE	STAN	CE, DRU	G, DEVICE AND C	OSME	TIC ACT)
							,					Perry County, did k		
the intent	to deliver	controlled	substances	s, namely	. Fentan	ıvl, a sched	lule II Controll	ed Subs	tance, on	or abo	out April 3	, 2021. The said ac	tor no	t then and there
being reg	istered un te State B	der the Co	ntrolled Sub	stance, [Drug, De	evice and C	osmetic Act, A	cto of A	pril 14, 19	972, or	a practiti	oner registered or li	censed	by the
арргорна	ie state p	Jaru.	•											·
Incho	4. T	7 4444		☐ Solici	tation	100	onspiracy			1 £	10-0	Age 60 or Older		·
Offen		Attempt 18 90,1 A		18 902			903		Num	per or	Vicums /	age 60 or Older _		-
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	12	780-1		(A)(of the	TITLE 35			F		NCIC Offense Cod		LICE/NIPBO C-4-
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(if a	applicab	e)	Number	200					Intersta			Safety Zone		☐ Work Zone
Statute	Descript	ion (incl	ıde the n SECTION	ame of 780-11	statute 3 (A)(3	e or ordir (0) OF ACT	nance): PRO F 64 (THE CO	HIBITE	D ACTS:	POSS STAN	ESSION CE, DRU	WITH INTENT TO G, DEVICE AND CO	DELI OSME	VER A TIC ACT)
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to deliver	a controlle	ed substan	ce, namely,	Metham	phetami	ne, a sched	dule II Control	led Subs	stance, on	or abo	out May 1	nty, did knowingly p 9, 2021. The sald a	ctor n	ot then and
there beir	ng register	ed under ti	ne Controlle	d Substa	nce, Dri	ug, Device	and Cosmetic	Act, Act	o of April	14, 19	72, or a p	ractitioner registere	d or lic	censed by the
appropria	te State Bo	oard.							,					•

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Docket Number:	Date Fi	iled:	OT	N/LiveScan	Numb		ULI	Comp	plaint/incident N		LAINI
Defendant Name:	First:	<u>/</u> Г		Middle: WESLEY		I .	L Last: FOW		200109XM		<u>.</u>
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Inchoate											
	0-113	(A)(30)	of the	TITLE 35	T:W-\	1	F		NCIC Offense Code	Lion	NIBRS Code
Lead? Offense# PennDOT Data (if applicable)	Section Accident Number	Subsection		. PA Statute (Counts Interstate	.	ade . 🔲	Safety Zone		ork Zone
Statute Description (CONTROLLED SUBSTA	include the n NCE: SECTION	ame of statu 780-113 (A)(te or ordii 30) OF AC	nance): PRO T 64 (THE CO	OHIBITI ONTROL	D ACTS: P LED SUBS	POSSE	SSION E, DRU	WITH INTENT TO G, DEVICE AND C	DELIVER OSMETIC	Y A ACT)
Acts of the accused to deliver a controlled sub registered under the Cont State Board.	stance, namely,	Fentanyl, a sch	edule II Co	ntrolled Substa	ance, on	or about M	lay 19,	2021.	The said actor not t	hen and the	ere being
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Inchoate		☐ Solicitation 18 902 A		onspiracy 1903		Numbe	er of V	ictims /	Age 60 or Older _		
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(if applicable) Statute Description (CONTROLLED SUBSTAI		ame of statu			HIBITE	D ACTS: P	OSSES	SSION	WITH INTENT TO	DELIVER	ΥA
Acts of the accused a to deliver a controlled sub registered under the Cont State Board.	stance, namely,	Marijuana, a so	hedule I Co	ntrolled Substa	ance, on	or about M	lay 19,	2021.	The said actor not t	hen and th	ere being
							•	······································			
Inchoate	•	Solicitation 18 902 A	☐ Con	nspiracy 903		Number	of Vic	tims A	ge 60 or Older		
☐ 15 75: Lead? Offense#	.2 Section	A Subsection	of the	TTTLE 18 PA Statute (T	"itle\	1 Counts	F3	ada	NCIC Offense Code	IICB/N	IIBRS Code
PennDOT Data	Accident Number			·		Interstate			Safety Zone		ork Zone
(if applicable) Statute Description (i OF TITLE 18, PA CRIME	nclude the na	ame of statu	te or ordir	iance): CRII	MINAL	USE OF A C	COMM	UNICA	TION FACILITY: S	ECTION 7	7512 (A)
Acts of the accused a County, and Columbia Cou Heroin/Fentanyl and/or Ma of the Pennsylvania Crime	nty, did use a o rijuana betweer	ommunication on the time frame	levice, name e of July 23,	ely a cellular te	elephone	, to arrange	e transa	actions (of Methamphetamin	e and/or	

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

- 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 that non-confidential information and documents.

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

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

issuing authority, and attached.	-			<i>i</i> /	, , , , , , , , , , , , , , , , , , , ,	
				$/\!\!/\!$	/\#	67
(Date)	10		7	(Sig	rature of Affiant)	,
AND NOW, on this date	1/29/21	I certify that the	complaint has	been prope	erly completed and	l verified
An affidavit of probable cause must be	7 .ee completed before a wa	rrant can be issued	d.			
e e		an n	MAL		7.	
41-3-05		Kan X	LL No.	WA	#	•
(Magisterial District Court Number)	(Issui	ng Authority)		/ /	SEAL	
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Docket Number:		Date Filed: / /	OTN/LiveScan Numbe	er Complaint/Incident Number BN3200109XM
		First:	Middle:	Last:
Defendant Name: ROBERT			WESLEY	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.

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

Date My commission expires first Monday of January, 3424

SEAL

COMMONVEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 VS. MDJ: Hon. Elizabeth R. Frownfelter (NAME and ADDRESS): Address: 3553 Shermans Valley Road OKSANA ANDREEVA **REED** Loysville, PA 17047 First Name Middle Name Last Name Ge 2296 Valley Road Telephone: (717)789-4117 Manheim, PA 17545 NCIC Extradition Code Type □ 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION **Docket Number** Date Filed OTN/LiveScan Number Request Lab Complaint/Incident Number CR-423-21 Services? R 168957-5 8/29/21 ☐ YES BN3200109XM □ NO GENDER ров 05/16/1993 Add'l DOB Co-Defendant(s) ☐ Male First Name Middle Name Last Name Gen. AKA White Hispanic Hispanic Hispanic Hispanic N Hispanic N Hispanic N Hispanic Hispanic N Hispanic Hispanic N Hispanic RACE Asian Black Native American Unknown ETHNICITY ⊠ Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) · 🔲 PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Baid) Color GRN (Green) PNK (Pink) BLN (Blonde / Strawberry) BLK (Black) Eye BLU (Blue) BRO (Brown) GRN (Green) GRY (Grav) Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number 408081VD9 MNU Number 130 **Defendant Fingerprinted** ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 5 0 DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. Oth. NCIC Veh. Code School Veh. Reg. Plate # mat Ind, Sticker (MM/YY) same П as Def. VIN Year Make Model Style Color (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 08/22/2021 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) AGENT KURT ZITSCH BNIDC - #621 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above \square 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 (Place-Political Subdivision) (Subdivision Code)

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

in PERRY County

1501

(County Code)

	POLICE	CRIMINAL	COMPLAIN
h		O	TOWN DIAM

4 4				70000	POLI	CE CI	RIMINAL	_ COI	MPLAINT
Docket Number:	Date Filed: / /	ОТ	N/LiveScan N	umber			int/incident i 0109XM	Number	•
Defendant Name:	First: OKSANA		Middle: ANDREEVA		Last: REED)			
Triangular with a property of the first	0107070							·.··	
The acts committed by	the accused are	e described belo	w with each /	Act of Assem	ibly or s	statute a	llegedly vio	lated, if	appropriate.
When there is more that (Set forth a brief summary of	n one offense.	each offense sh	ould be numb	ered chrono	logicall	٧.		•	
without more, is not sufficier The age of the victim at the ti	nt. In a summary cas	se, vou must cite the	specific section	(s) and subsec	tion(s) o	f the statut	te(s) or ordinal	nce(s) alle	egedly violated.
be listed. If the identity of an	account must be es	stablished, list only	the last four digi	s. 204 PA.Code	§§ 213.1	213.7.)			,
Inchoate	Solic		onspiracy		Num	ber of Vic	tims Age 60 c	r Older	
Offense 18 901 A	18 90	2 A 18	3 903	<u> </u>	<u> </u>				
□ 1 911	(B)(3	3) of the	TITLE 18	1	F1_				
#	ction Subse	ection	PA Statute (Titl	e) Counts	Gr	ade .	ICIC Offense Code	UCF	NIBRS Code
PennDOT Data (if applicable)	Accident Number	NAME OF THE PARTY		☐ Interstate		☐ Saf	fety Zone		Work Zone
Statute Description (inc	lude the name o	of statute or ordi	nance): corr	UPT ORGANIZ	ZATION	s	,		
Acts of the accused ass	sociated with thi	s Offense: Betwe	en July 23 2020	and May 19, 2	021. the	Defendan	t did. conduct	or partici	pate directly or
indirectly, while being employ is, during the periods as set f	ed by or associated	l with an enterprise,	in the conduct of	f such enterpris	se's affair	rs through	a pattern of ra	cketeerir	g activity, that
in the possession of controlle	d substances (meth	amphetamine and/o	r heroin/fentany	and/or marijua	ana) with	the intent	to distribute,	did condu	act or participate
directly or indirectly in the aff violation of Title 18 PA. C.S. 9	911 (B) (3), The pat	tern of racketeering	consists of multi	ple acts of viola	ation of t	he Controll	led Substance,	Drug, De	evice and
Cosmetic Act. 35 P.S. § 780-1	.13(a) (30), specific	ally to include, but r	not limited to, the	e offenses outlir	ned in thi	s complair	it.		
Inchoate	☐ Solic	itation 🔲 C	onspiracy	7	Num	ber of Vic	tims Age 60 c	r Older	•
Offense 18 901 A	18 90	2 A 18	3 903						
□ 2 911	(B)(4	4) of the	TITLE 18	1	F1		1010.0%		
	ction Subse	ection	PA Statute (Titl	e) Counts	Gra	ade . N	ICIC Offense Code	UCR	/NIBRS Code
PennDOT Data (if applicable)	ocident Number			☐ Interstate	,	☐ Saf	fety Zone		Work Zone
Statute Description (inc	lude the name of	of statute or ordi	nance): corr	UPT ORGANIZ	ZATION	S			
Acts of the accused ass	sociated with thi	s Offense: Betwe	en July 23, 2020	, and May 19, 2		Defendant	t did, within th	e County	of Perry,
Pennsylvania and elsewhere, Organizations, that is, during	conspire to violate I	the provisions of Sec	ction 911(b)(3) o	f the Crimes Co	de, 18 P	a.C.S. § 91	L1(b)(3), perta	ining to C	Corrupt
Organizations, did conspire at herein, would conduct or part	nd agree with other	individuals, that the	ey, or one or mor	e of them, whil	e employ	ed by or a	issociated with	the ente	rprise set forth
18 Pa.C.S. § 911(h), In violation of the Controlled Sul	on of Section 911(b)(4) of the Crimes (Code, 18 Pa.C.S.	§ 911(b)(4). T	he patte	rn of racke	eteering consis	ts of mult	iple acts of
Violation of the Controlled Sui	ostance, Drug, Devi	CE AND COSMECC AC	L 35 P.S. 9 78U	LISTALTSUL.			<u> </u>		-
Inchoate			onspiracy	Num	ber of V	ictims Age	e 60 or Older		
Offense 18 901 /	18 90	02 A 18	3 903					·····	
□ 3 780-		(30) of the	TITLE 35	1	F		NOIO 0/5		100 / 100 00 00 00
PennDOT Data	Accident	bsection	PA Statute (Ti	tle) Counts ☐ Intersta			NCIC Offense C Safety Zone		JCR/NIBRS Code Work Zone
(if applicable) Statute Description (incl	Number — ude the name c	 of statute or ordi	nance): CRIMI	NAL CONSPI	RACY TO	COMMI	r violation	S OF TH	E
CONTROLLED SUBSTANCE DRUG, DEVICE AND COSM	, DRUG, DEVICE, ETIC ACT)	AND COSMETIC A	CT, SECTION 7	/80-113 (A)(3	0) OF A	CT 64 (TH	IE CONTROLI	.ED SUB	STANCE,
Acts of the accused ass promoting or facilitating the co	ociated with this	s Offense: Betwee	en July 23, 2020,	and May 19, 2	021, the	Defendant	, Oksana Reed	, with the	intent of
which constitutes a crime or d	lid agree to aid such	h other person or pe	rsons the plannir	ng or commissio	n of suc	h crime or	of an attempt	or solicità	ation to commit
such crime, that is, at various Nikolaus Andrews, Thomas Pr	iar, Bradley Trump,	Chelsey Andrews, D	Douglas Farner, E	arry Melhorn, S	Cott Rov	rello, Micha	ael Reabuck, a	nd others	,; that they, or
one or more of them, would e	ngage in conduct o	onstituting multiple stanyl and/or mariju	violations of the	Controlled Subs	itance Dr conspirac	ug, Device v one or n	and Cosmetic	Act, 35 P	7.S. § 780- nmitted

AOPC 412A - Rev. 7/18

			•		₩ P	OLI	CE C	CRIMINAL (COMPLAINT
Docket Number:	Date Filed:		OTN/LiveSc	an Numbe	er			aint/Incident Nu	nber
	/_/ First:		Middle:		-	Last:	BN3Z	00109XM	
Defendant Name:	OKSANA		ANDRE	EVA		REEL)		
Inchoate ☐ Attempt Offense	,	icitation 902 A	☐ Conspiracy 18 903		Numbe	r of Vi	ctims Aç	ge 60 or Older	
□ 4 780-1	.13 (A	(30) of	the TITLE	35	1	F			
		ubsection	PA State	ute (Title)	Counts	Ğ	rade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				Interstate			Safety Zone	☐ Work Zone
Statute Description (inc	lude the name	of statute of or of statute of st	r ordinance): /ICE AND COSN	DELIVERY IETIC ACT)	OF A CON	TROLL	ED SUB	STANCE: SECTION	780-113 (A)(30)
Acts of the accused ass dld, as a principal and/or accusion substance being included in S licensed by law to possess sa	omplice, deliver a schedule II of the	controlled subs	tance. To Wit: M	ETHAMPHET	AMINE, to	a Conf	idential I	informant (CI), with	said controlled
Inchoate	·	olicitation 902 A	Conspiracy 18 903	′	Numb	er of V	/ictims /	Age 60 or Older	
□ 5 780-	113 (A)(30)	Nue TITLE	35	1	F			-
Lead? Offense#	The state of the s	Subsection	PA Sta	tute (Title)	Counts	,	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			-	Interstate]] Safety Zone	☐ 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 ass the intent to deliver a control then and there being register by the appropriate State Boar	led substances, n ed under the Con	amely, Methami	ohetamine, a Sch	redule II Cor	ntrolled Sub	ostance	on or a	bout April 3, 2021.	The said actor not
							-		

									·
	6	780-113	(A)(30)	ofairtes	TITLE 35	1	F		:
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
(if	mDOT Da applicable	e) Number	35	•		☐ Interstate		Safety Zone	☐ 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	Acts of the accused associated with this Offense: The defendant, Oksana Reed, in Tuscarora Township, Perry County, did knowingly possess with								

Number of Victims Age 60 or Older _

☐ Conspiracy

18 903

☐ Solicitation

18 902 A

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.

☐ Attempt

18 901 A

Inchoate

Offense

					POL	ICE (CRIMINAL C	OMPLAINT
Docket Number:	Date Filed: / /	-	OTN/LiveScan N	Number Complaint/Incident BN3200109XM			laint/Incident Num 200109XM	ber
Defendant Name:	First: OKSANA		Middle: ANDREEVA		Last:			
Inchoate ☐ Attempt Offense 18 901 A			Conspiracy 18 903	Nun	nber of V	ictims A	ge 60 or Older	WHO HERE AND A SECOND ASSESSMENT
□ 7 7 512	A	ofthe	1865	1	F3	}		
	A CONTROL OF STREET AND ADDRESS OF THE PARTY	section	PA Statute (Tit	le) Coun	ts (Frade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			☐ Interst	ate		Safety Zone	☐ Work Zone
Statute Description (inc		of statute or o	ordinance): CRIM	INAL USE OI	F A COM	MUNICA	TION FACILITY: SE	CTION 7512 (A)
Acts of the accused ass communication device, name frame of April 7, 2021 to May Pa.C.S. 7512 (A)	ly a cellular telephor	ne, to arrange tr	ansactions of Metha	imphetamine a	and/or He	roin/Fen	tanvi and/or Marijuana	between the time
								<u></u>
Inchoate ☐ Attemp Offense 18 901			Conspiracy 18 903	Nu	mber of	Victims	Age 60 or Older	
□ 8 3802		(1)(ii ofti		1	N	<u> </u>	·	·
Lead? Offense# PennDOT Data	Section Su Accident	bsection	PA Statute (T			Grade	NCIC Offense Code	UCR/NIBRS Code
(if applicable)	Number —			☐ Inters		1	Safety Zone	☐ Work Zone
Statute Description (inc	lude the name o	of statute or c	ordinance): DRIV :	ING UNDER	THE INF	LUENCE	OF A CONTROLLED	SUBSTANCE
Acts of the accused ass movement of a motor vehicle Device and Cosmetic Act, who methamphetamine, a Schedu County, PA.	while there was in ich was not medicall	her blood any ar v prescribed for	mount of a Schedule her, To Wit: Oksa	II Controlled na Reed's bloc	Substand od contair	e as defi ned 430 r	ned in the Controlled S nanograms per millilite	Substance, Drug, r of
)			
			•		•			

☐ Conspiracy 18 903

PA Statute (Title)

of the

Number of Victims Age 60 or Older _

NCIC Offense Code

☐ Safety Zone

Grade

Counts

☐ Interstate

☐ Solicitation

18 902 A

Subsection

Inchoate

Offense

Lead?

od? Offense#
PennDOT Data

(if applicable)

Attempt 18 901 A

Section

Acts of the accused associated with this Offense:

Accident

Number

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

UCR/NIBRS Code

☐ Work Zone

1	*			
3	POLICE	CRIMINAL	COMPL	.AINī

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

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

of Pennsylvania and were c	contrary to the Act(s) of the a	after, were against the peace and dignity of the Commonwealth Assembly, or in violation of the statutes cited. vit of probable cause must be completed, sworn to before the
(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 w	arrant can be issued.

(Issuing Authority)

41-3-05

(Magisterial District Court Number)

SEAL

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

	Ln #	621
(Sig	nature of Affiant)	
Sworn to me and subscribed before me this day of Augus	f = a	2021
Date Magiste	rial District Judg	e
My commission expires first Monday of January, 2044		
	SEAL	

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA COUNTY OF PERRY Magisterial District Number: 41-3-05 VS. (NAME and ADDRESS): MDJ: Hon. Elizabeth R. Frownfelter WAYNE REABUCK Address: 3553 Shermans Valley Road SCOTT Middle Name Last Name Ge First Name Loysville, PA 17047 82 Lover Drive Bloomsburg, PA 17815 Telephone: (717)789-4117 NCIC Extradition Code Type 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States 1-Felony Full ☐ Distance: D-Misdemeanor No Extradition 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ E-Misdemeanor Pending Extradition ☐ A-Misdemeanor Full 3-Felony Surrounding States ☐ F-Misdemeanor Pending Extradition □ B-Misdemeanor Limited 4-Felony No Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab OTN/LiveScan Number Complaint/Incident Number Date Filed **Docket Number** Services? R 168958-6 ☐ YES ☐ NO 8 1291 21 CR-424-21 BN3200109XM 5 Co-Defendant(s) Add'l DOB ров 8/18/1966 Last Name Gen. Middle Name Male First Name ☐ Female AKA Unknown Native American White Hispanic Hispanic Hispanic Hispanic N Hispanic Hispanic N Hispanic N Hispanic ☐ Black ☐ Asian RACE Unknown Non-Hispanic ETHNICITY BRO (Brown) PLE (Purple) SDY (Sandy) ·□ BLU (Blue) RED (Red/Aubn.) GRY (Gray) Hair PNK (Pink) XXX (Unk./Bald) GRN (Green) ☐ WHI (White) BLK (Black) ONG (Orange) Color BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BRO (Brown) BLU (Blue) BLK (Black) Eye XXX (Unknown) MAR (Maroon) PNK (Pink) MUL (Multicolored) HAZ (Hazel) Color WEIGHT (lbs.) ☐ YES ☐ NO **DNA Location** DNA 160 FBI Number 761477EB2 **MNU Number** Ft. HEIGHT In. ☐ YES ☐ NO Defendant Fingerprinted 6 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth. NCIC Veh. Code Rea. Comm'i Veh. State Registration Haz Ind. same mat Sticker (MM/YY) Plate # as Def. Style Color Model Make Year VIN 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). 08/22/2021 SDAG ROBERT SMULKTIS (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) BNIDC - #621 AGENT KURT ZITSCH (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [214] (Subdivision Code) (Place-Political Subdivision)

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

in PERRY County

[50]

(County Code)

			•				P	OLICE	CRIMINAL	COMPLAINT
Docket Number	er:	Date Fi	led:	ОТ	N/LiveScan N	lumbe	er		plaint/Incident I 200109XM	Number
Defendant Nar	ne:	First:	<u> </u>	I	Middle: WAYNE		1	Last: REABUCK		·
		SCOTT			WATINE			KLADUCK		
									444	
The acts com	mitted by	the accus	ed are descr	ibed belo	w with each	Act o	f Assemb	ly or statul	e allegedly viol	ated, if appropriate.
When there is		the feets or	History to advice	a fha dafani	dant of the nati	ite of th	ie offensets	u cnarded. A	citation to the stat	ute(s) allegedly violated,
and the second second and the second	mat aufficiar	t In a cump	THOM ASES VER	uset cita the	snecific sectio	nn(s) ar	id subsectio	on(s) of the s	tatuteis) or ordinai	nce(s) allegedly violated. on (e.g. PINs) should not
The age of the vie be listed. If the id	ctim at the ti lentity of an	me of the of account mu	tense may be m st be establishe	d, list only 1	the last four dig	its, 204	PA.Code §	§ 213.1 – 213	3.7.)	on (o.g. :o, ooo.
						·····1				
	18 901 A	. [Solicitation 18 902 A		onspiracy 903			Number of	Victims Age 60 c	or Older
Offense	10 901 A		10,302 A	,,,						
1	911		(B)(3)	of the	TITLE 18		1	F1		*
Lead? Offense	Se	ction	Subsection		PA Statute (T	itle)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT E	And this continue was to be a single	Accident Nur	mber				interstate		Safety Zone	☐ Work Zone
Statute Descr	iption (inc	lude the r	name of statu	te or ordi	nance): cor	RUPT	ORGAŅIZ/	ATIONS		
,	• •									
Acts of the ac	cused ass	sociated w	vith this Offer	ise: Betwe	en July 23, 202	0, and	May 19, 20	21, the Defer	ndant did, conduct	or participate, directly or
indirectly, while t	eing employ	ed by or as	sociated with an	enterprise,	in the conduct	of such	n enterprise employed b	's affairs thro v or associate	ugh a pattern of ra ed with an enterpris	cketeering activity, that se engaged in the
necession of cor	stralled cube	tancec (met	hamnhetamine a	and/or hero	in/tentanyl and.	/or mai	rituana) Witi	n the intent t	o aistribute, dia coi	iduct or participate
dimentity or indirect	the in the off	faire of eaid.	antarnrice throu	oh a natteri	n of racketeerin	a activ	itv as define	ed in little 18	Pa.C.S. § 911(h)(1 htrolled Substance,) all of which is in
Cosmetic Act. 35	P.S. § 780-1	(13(a) (30).	specifically to in	clude, but r	not limited to. ti	he offe	nses outline	d in this com	plaint.	
•							•			,
Inchoate _	Attempt		Solicitation		onspiracy			Number o	Victims Age 60 c	r Older
Offense	18 901 A		18 902 A	18	3 903				,	
□ 2	911		(B)(4)	of the	TITLE 18		1	F1	NCIC Offense	•
Lead? Offense#	*	ction .	Subsection		PA Statute (T	itle)	Counts	Grade	Code	UCR/NIBRS Code
PennDOT D		Accident Nur	mber				Interstate		Safety Zone	☐ Work Zöne
Statute Descr	iption (inc	lude the r	name of statu	te or ordi	nance): cor	RUPT	ORGANIZA	ATIONS	•	
•										
Acts of the ac	cused ass	sociated v	vith this Offer	se: Betwe	en July 23, 202	0, and	May 19, 20	21, the Defer	ndant did, within th	e County of Perry and .
أحانيه وأحملنا والمالية	la na ant fort	h harain Da	ifondant with th	e Intent of	oromotina or fa	ıcilitatir	na the comm	nission of the	crime of Corrupt C	rganizations, that is, Organizations, did
annealise and agr	an with atha	r individuale	that they or o	ne or more.	of them, while	emplo\	ed by or as	sociated with	i the enterprise set	torth nerein, would
conduct or partic	ipate, directi on of Section	y or indirect 1 911(b)(4) (ly, in the condu of the Crimes Co	ct or the air ide, 18 Pa.C	ans of the ente LS. § 911(b)(4)	i prise i i. The	pattern of	racketeering	consists of multiple	defined in 18 Pa.C.S. § acts of violation of the
Controlled Substa	ence. Drug.	Device and (Cosmetic Act. 35	P.S. 6 780	-113(a) (30).		·			
				•						
Inchoate	☐ Attemp		☐ Solicitation		onspiracy		Numb	er of Victims	Age 60 or Older	MH44 mare
Offense	18 901 /	4 1	18 902 A		8 903					
□ 3	780-	113	(A)(30)	of the	TITLE 35		1	F		
Lead? Offens		Section	Subsection		PA Statute (Counts	Grade 	NCIC Offense C	
PennDOT (if applica	thie)	Accident Number					Interstate		☐ Safety Zone	☐ Work Zone
Statute Descr	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,									
DOUG DOUGCE	AND COCK	IETTO ACTI								
A ata of the ac	aucad acc	ociated w	/ith this Offer	ise: Betwe	en July 23, 202	0, and	May 19, 20	21, the Defer	ndant, Scott Reabuc nore of them would	k, with the intent of engage in conduct
which constitutos	a crime or /	did agree to	aid such other r	ierson ar ne	ersons the plant	nina or	commission	1 or such crim	ie or or an attempt	or solicitation to commit
cuch crime that i	e of various	locations in	Perry County a	nd elsewbei	re. Defendant d	id agre	e with Robe	ert Fowler, Ar	itnony Leming, Mar	c Bankes, Nikolaus ; that they, or one or
more of them we	ould endage.	in conduct of	ronstitutina mult	inle violatio	ns of the Contr	olled Si	ubstance Dr	rug, Device ai	nd Cosmetic Act, 35) P.S. § /80-113(a)
(30)(methamphe	tamine and/	or heroin/fe	ntanvl and/or m	ariiuana). a	nd in pursuance	of suc	h conspirac	y one or mor	e overt acts were o	ommitted.

K.	DOLLCE	CRIMINAL	COMPL	AINIT
3	POLICE	: CRIMINAL	. COMPL	AIN I

Docket	Numbe	ər:	Date /	Filed:		ОТ	N/LiveScar	Nun	nber			Comp	laint/Incident N 200109XM	lumb	er
Defend	ant Nar	ne:	First:	_ <i></i> '			Middle: WAYNE				∟ast: REAB	UCK			
	-														
Incho Offen	20.000 1000 1000	☐ Attempt 18 901 A		☐ Solicit			nspiracy 903			Number	of Vic	tims A	ge 60 or Older		
П	4	780-	113	(A)(30)	of the	TITLE 35			 1	F				
Lead?	Offense		Section		ection		PA Statute			Counts	Gr	ade	NCIC Offense Co	de	UCR/NIBRS Code
Per	nDOT	Data	Accider Numbe	it .					_	nterstate		-	Safety Zone		☐ Work Zone ·
Ctatuta	Dosár	intion (inc	lude the	name o	f statute L3 (A)(30	or ordi) OF AC	nance): PR T 64 (THE C	OHIB ONTI	ITE!	ACTS: P ED SUBS	OSSE TANC	SSION E, DRU	WITH INTENT T G, DEVICE AND	COSM	LIVERY A (ETIC ACT)
intent to and then	deliver a e being r	اممالمسفسمي	aubatanaa	namali A	10thomnho	stamine	a Schedule II	Cont	rollec	i Substanc	e. on c	or about	oia County, did kno May 19, 2021. T r a practitioner re	ne sai	y possess with the d actor not then ed or licensed by
Inchd Offer	(4) 在 10 年 10 年 10 年 10 年 10 日 10 日 10 日 10 日	Attemp		☐ Solic 18 90	itation 2 A		Conspiracy 8 903	-		Numbe	er of V	ictims	Age 60 or Older		
. 🗖	5	780	-113	(A)	(30)	of the	TITLE 3			1	F				
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Ct-tut-	applica Descr	intion (inc	Numb lude the	name	f statute	or ordi	nance): PR	OHIE	ITE	ACTS: P	POSSE	SSION	WITH INTENT	O DE	LIVERY A
Acts of	the ac	cused as controlled under the C	sociated	with this	Offense) OF AC The description of the control of the co	efendant, Sco	onti itt Rea	buck	, in Bloom	sburg,	Columb	oia County, did kno	owingl actor	y possess with the not then and there
incho Offen		Attempt 18 901 A		Solicit 18 902			onspiracy 903		,	Numbe	r of Vi	ctims A	ge 60 or Older		
	6	7512		Α		of the	TITLE 18			1	F3				
Lead?	Offens		Section Accider		ection		PA Statute	(Title)		Counts nterstate	G	rade	NCIC Offense Co Safety Zone	de	UCR/NIBRS Code ☐ Work Zone
100	annliaa	hla)	Number clude the	r∷∣ — name o	f statute	or ordi	nance): CR	IMIN	_		OMM		•	SECT	ION 7512 (A) OF
TITLE 1	8, PÅ C	RIMES CO	DE	•											•
device, r	namely a frame o	- alledon tale	phone, to 21 and Ma	arrango fra	ancartions	of Contr	olled Substar	ices (I	Metha	amnhetam	ine an	a/or Hei	y, and elsewhere, oin/Fentanyi, and the Pennsylvania	/OF Mic	se a communication arijuana) between s Code, as

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
1		14010	
	First:	Middle:	Last:
Defendant Name:	SCOTT	WAYNE	REABUCK

- 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 that non-confidential information and documents.

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

(Date)

AND NOW, on this date

8/29/21 | certify that the complaint has been properly completed and verified.

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

Hssuing(Authority

41-3-05
(Magisterial District Court Number)

SEAL

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
Defendant Name:	First:	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.

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 MDJ: Hon. Elizabeth R. Frownfelter (NAME and ADDRESS): Address: 3553 Shermans Valley Road THOMAS PRIAR III First Name Middle Name Last Name Ge Loysville, PA 17047 189 Bedford Trail Ickesburg, PA 17037 Telephone: (717)789-4117 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab OTN/LiveScan Number Docket Number -Date Filed Complaint/Incident Number Services? CR-425-21 R168959-0 8129121 ☐ YES ☐ NO BN3200109XM **GENDER** ров 7/11/1985 Co-Defendant(s) Add'l DOB First Name Middle Name Last Name Gen. ☐ Female ΔΚΔ White Hispanic Hispanic Hispanic Hispanic N Hispanic N Hispanic RACE 🔲 Asian Black Native American Unknown ETHNICITY Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair ONG (Orange) XXX (Unk./Bald) GRN (Green) BLK (Black) ☐ WHI (White) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eve HAZ (Hazei) PNK (Pink) Color MAR (Maroon) MUL (Multicolored) XXX (Unknown) **DNA Location** WEIGHT (lbs.) DNA ☐ YES ☐ NO FBI Number **MNU Number** 290521AD5 195 ☐ YES · ☐ NO Ft. HEIGHT In. **Defendant Fingerprinted** Fingerprint Classification: 0 DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh. Code State Registration Comm'l Veh. Haz Reg. mat Ind. same Plate # Sticker (MM/YY) as Def. Year Make Model Style Color VIN 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 08/22/2021 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) BNIDC - #621 AGENT KURT ZITSCH (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above □ I accuse the defendant whose name is unknown to me but who is described as

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have

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

in PERRY County

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [214]

(County Code)

[50]

Various Locations
(Place-Political Subdivision)

POLICE CRIMINAL COMPLAIN	各	POLICE	CRIMINAL	COMPLAIN
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a grade to				(3)	POL	CE	CRIMINA	L COMPLA	AINT
Docket Number:	Date Filed: / /	ОТО	N/LiveScan Nur	mber			olaint/Incident 200109XM	Number	
	First:	1	Middle:		Last:				1.
Defendant Name:	THOMAS		DANIEL	_	PRIA	R III	-		
•									
The acts committed by When there is more that (Set forth a brief summary of without more, is not sufficier. The age of the victim at the tibe listed. If the identity of an	in one offense, the facts sufficient it. In a summary ca me of the offense r	each offense sho to advise the defend se, you must cite the nay be included if kno	ould be numbe lant of the nature specific section(s own. In addition, s	red chror of the offen s) and subs social secur	nological se(s) char ection(s) o rity numbe	y. ged. A c f the sta rs and f	citation to the sta atute(s) or ordina financial informa	itute(s) allegedly vi	olated, olated.
Inchoate	☐ Solid 18 90		nspiracy 903		Num	ber of	Victims Age 60	or Older	
☑ 1 911	(B)(3) of the	TITLE 18	1	F1				
Lead? Offense Se	ction Subs	ection	PA Statute (Title)	Coun	its Gr	ade	NCIC Offense Code	UCR/NIBRS C	ode
PennDOT Data	Accident Number			☐ Interstat	te l	П	Safety Zone	☐ Work Z	one
(if applicable)		of atalysts are seeding						1 1 10002	
Statute Description (inc	lude the name	or statute or ordin	iance): corru	FI UKGAN	ILAI IUN	.	,		
is, during the periods as set fin the possession of controlled directly or indirectly in the affiviolation of Title 18 PA. C.S. S. Cosmetic Act. 35 P.S. § 780-1 Inchoate	d substances (methairs of said enterpr 111 (B) (3). The pa	amphetamine and/or ise through a pattern tern of racketeering ally to include, but no litation Co	heroin/fentanyl a of racketeering a consists of multipl	ind/or marij ctivity as de le acts of vi	juana) with efined in Ti olation of t tlined in th	the int tle 18 F he Coni	tent to distribute, Pa.C.S. § 911(h)(i trolled Substance	did conduct or par 1) all of which is in e, Drug, Device and	ticipate
	,						T		
□ 2 911	(B)(4) of the	TITLE 18	1	F1		NCIC Offense		
	ction Subs	ection	PA Statute (Title)	Coun	ts Gr	ade 	Code	UCR/NIBRS Co	ode
PennDOT Data (if applicable)	ccident Number		-	☐ Interstat	e [Safety Zone	☐ Work Zo	one
Acts of the accused ass Pennsylvania and elsewhere, Organizations, that is, during Organizations, did conspire an herein, would conduct or part 18 Pa.C.S. § 911(h), in violation	sociated with thi conspire to violate the periods as set and agree with other icloate, directly or	s Offense: Betwee the provisions of Sect forth herein, Defenda Individuals, that they ndirectly, in the cond	in July 23, 2020, a tion 911(b)(3) of t nt, with the intent y, or one or more luct of the affairs	and May 19, the Crimes t of promoti of them, w	, 2021, the Code, 18 P ing or facili hile employ	Defender a.C.S. § tating to lead by one of the lead by one of the lead and the lead are the lead	3 911(b)(3), perta the commission of or associated with attern of racketee	aining to Corrupt f the crime of Corru n the enterprise set ering activity as def	upt : forth ined in
violation of the Controlled Sut	ostance, Drug, Devi	ce and Cosmetic Act.	35 P.S. 6 780-11	3(a) (30),	The patte			or muliple deta	
Inchoate			onspiracy 903	Nu	mber of V	ictims	Age 60 or Older		,
□ 3 780-		(30) of the	TITLE 35	1	F				
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(if applicable)	Number —			☐ Inters			Safety Zone	☐ Work Z	one
Statute Description (incl	ude the name o	of statute or ordin	ance): CRIMIN	AL CONSP	IRACY TO	CT 64	MIT VIOLATION	IS OF THE	
CONTROLLED SUBSTANCE DRUG, DEVICE AND COSM	ETIC ACT)								
Acts of the accused ass promoting or facilitating the continuous which constitutes a crime or disuch crime, that is, at various Nikolaus Andrews, Oksana Resone or more of them, would e 113(a) (30)(methamphetamin	ociated with this ommission of a crin id agree to aid sucl locations in Perry C ed, Chelsey Andrew noage in conduct o	ne, did agree with one o other person or per County, Pennsylvania is, Michael Rowello, E onstituting multiple v	e or more other posons the planning and elsewhere, Događey Trump, Događen Trump,	ersons that or commis efendant di ouglas Farne ontrolled Su	they or on sion of suc d agree wi er, Barry M bstance Dr	e or mo h crime th Robe elhorn, ug, Dev	ore of them would or of an attempt ort Fowler, Anthor Scott Reabuck, a vice and Cosmetic	d engage in conductor solicitation to complete the complete the complete the complete the conductor of the c	t ommit inkes, ey, or

AOPC 412A - Rev. 7/18

	POLICE	CRIMINAL	COMPL	.AIN1
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1,	1								POI	LICE	CRIMINAL	COMPLAINT
Docke	t Numbe	r:	Date F	iled: /	01	N/LiveSca	n Numbe			Com	plaint/incident Nu 200109XM	
Defen	dant Nam	ie:	First:	<u> </u>		Middle:			Las			
1995 (1986) -			THOMA	.5		DANIEL			Į PK.	IAR III		
. <u> </u>												
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	4	780-1		(A)(30	(3.54) (3.4) (3.4) (3.4) (3.4)	TITLE 35	I	1	F			
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	applicab		Number		- tatista ar ardi	nanaa): 55	_					
											I WITH INTENT TO JG, DEVICE AND CO	
to delive	er a control ed under th	ied substan	ce, namely,	Fentanyl, a	a Schedule II Co	ontrolled Subs	tance, on	or about	May 1	19, 2021.	inty, did knowingly p The said actor not tl registered or licensed	
Incho Offe	All medical relations of the Con-	Attempt 18 901 A		☐ Solicitat 18 902 A	—	onspiracy 8 903		Num	ber of	f Victims	Age 60 or Older	,
	5	7512		Α	of the	TITLE 1	8	1		F3		
Lead?	Offense		ection	Subsec	tion	PA Statute	(Title)	. Count	s	Grade	NCIC Offense Cod	e UCR/NIBRS Code
A second second	nnDOT D applicat	Specimental Commence of the Co	Accident Number	5000	_		E] Intersta	te	.1	☐ Safety Zone	☐ Work Zone
Statute	Descrip		ide the n		tatute or ordi	nance): cr :	IMINAL	USE OF	A COM	1MUNIC	ATION FACILITY: S	ECTION 7512 (A)
device, r	namely a ce	ellular telepi	none, to arr	ange transa	actions of Metha	amphetamine	and/or He	eroin/Fen	tanyl a	and/or Ma	d elsewhere, did use irijuana between the Code, as amended, 1	time frame of April 7,
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Incho Offen	20 (10 (10 (10 (10 (10 (10 (10 (10 (10 (1	Attempt 18 901 A		Solicitation 18 902 A		nspiracy 903		Numb	er of \	/ictims A	ge 60 or Older	
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	mDOT Da applicabl		Accident - Number) ()	,	•		Interstate)		Safety Zone	☐ Work Zone
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Acts of	the accu	ised asso	ciated w	th this O	ffense:		<u> </u>				· · · · · · · · · · · · · · · · · · ·	
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
	First:	Middle:	Last:
Defendant Name:	THOMAS	DANIEL	PRIAR III

- 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 that non-confidential information and documents.

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

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

issuing authority, and attac	nea.)	
	,	
(Date)	e e	(Signature of Affiant)
AND NOW, on this date	8/19/21	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.

(Magisterial District Court Number)

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

Sworn to me and subscribed before me this

Date

Date

My commission expires first Monday of January, 2021.

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 VS. MDJ: Hon. Elizabeth R. Frownfelter (NAME and ADDRESS): Address: 3553 Shermans Valley Road **NIKOLAUS** NHOL Andrews First Name Middle Name Loysville, PA 17047 Last Name 17 Beechwood Drive Middletown, PA 17057 Telephone: (717)789-4117 NCIC Extradition Code Type ☐ C-Misdemeanor Surrounding States 1-Felony Full 5-Felony Pending Extradition ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab Date Filed OTN/LiveScan Number **Docket Number** Complaint/Incident Number Services? CK- 422-21 8129121 R 168955-3 BN3200109XM ☐ YES ☐ NO GENDER DOB 12/11/1979 Co-Defendant(s) POB Add'i DOB Middle Name ✓ Male First Name Last Name Gen. ☐ Female AKA RACE ☑ White Asian Black Native American Unknown **ETHNICITY** ☐ Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair ONG (Orange) BLK (Black) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number **MNU Number** 501849MB3 260 Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 10 **DEFENDANT VEHICLE INFORMATION** Oth. NCIC Veh. Code State Registration Comm'l Veh. School Veh. Haz Reg. mat Ind. same Plate # Sticker (MM/YY) as Def. VIN Year Make Model Style Color Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG ROBERT SMULKTIS 08/22/2021 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) AGENT KURT ZITSCH BNIDC - #621 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General (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 (Place-Political Subdivision) (Subdivision Code)

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

in PERRY County

[501]

(County Code)



The acts committed by the When there is more than Set forth a brief summary of twithout more, is not sufficient. The age of the victim at the time listed. If the identity of an a linchoate Attempt Offense Acts of the accused assortion of controlled substa	one offense, eache facts sufficient to In a summary case, the of the offense may occum must be established in Solicitat 18 902 A (B)(3) In Subsection of the name of solicitated with this Cociated with this Cociated with this Cociated sufficient to the solicitated sufficient to the solicitated with this Cociated sufficient to the solicitated with this Cociated with this C	escribed below ch offense should advise the defendaryou must cite the specific be included if known be included, list only the cition Consumble of the T.	ld be number of the nature of pecific section(s) no. In addition, so last four digits. 2	of Assembed chronologithe offensely and subsectional security	BN: Last: Andrews Oly or statu ogically. s) charged. A on(s) of the s numbers and §§ 213.1 – 213	citation to the statestatute(s) or ordina	elated, if appropria tute(s) allegedly violat nce(s) allegedly violat ion (e.g. PINs) should
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(if applicable) Actatute Description (included) Acts of the accused associated, while being employed, during the periods as set for assession of controlled substa	ide the name of sociated with this 0			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
cts of the accused assodirectly, while being employed, during the periods as set for assession of controlled substa	ociated with this C] Interstate		Safety Zone	☐ Work Zone
cts of the accused asso directly, while being employe , during the periods as set for ossession of controlled substa	ociated with this C	statuta or ordinai		-			
directly, while being employe , during the periods as set for ossession of controlled substa	ociated with this C	sauce of orund	noo, Corkup	: OKOMNIZA	4110N2		
directly, while being employe during the periods as set for essession of controlled substa	ciated with this C	S ee					
directly, while being employe during the periods as set for ssession of controlled substa	d hy ar accoclated wi	Offense: Between .	July 23, 2020, an	nd May 19, 20	21, the Defer	ndant did, conduct	or participate, directly
during the periods as set for ssession of controlled substa	a by or associated wi	th an enterprise, in	the conduct of su	ich enterprise	's affairs thro	ough a pattern of ra	acketeering activity, th
ssession of controlled substa	th herein, within the	County of Perry and	l elsewhere, while	e employed b	v or associate	ed with an enterpris	se engaged in the
	nces(methamphetam	ine and/or heroin/fe	entanyl and/or m	arijuana) with	the intent to	distribute did con	duct or participate
ectly or indirectly in the affai	re of eaid onterprise i	through a nattorn of	Frackotooring act	ailjuaila) Willi	die Title 10		uuct or participate
ectly of fidirectly in the arrangement of Title 18 PA. C.S. 91	1 /R) /2) The natter	anough a pattern or	nacketeering act	ivity as define	on of the Co	ra.C.S. 9 911(1)(1) all of which is in
smetic Act. 35 P.S. § 780-11	1 (D) (3). THE PAREN	To racketeering co	nsists or multiple	acts of violati	on or the Col	ntrolled Substance,	Drug, Device and
SHIEUC ACL. 35 P.S. 9 780-11	otal (30), Specifically	to include, but not	limited to, the or	renses outline	<u>a in this com</u>	plaint.	
nchoate	☐ Solicitat				Number of	Victims Age 60 o	r Older
Offense 18 901 A	18 902 A	18 90	3				
□ 2 911	(B)(4)	of the T	TLE 18	1	F1		
ad? Offense# Secti	on Subsection	on :	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data	cident Number			Interstate		Safety Zone	☐ Work Zone
(if applicable) atute Description (inclu	do the name of s	etatuta ar ardina:					
adde Description (inclu	de the hame of s	itatute or ordinal	ice). CORROP	OKGANIZA	IIIONS		
cts of the accused asso	ciated with this C	Offense: Between J	July 23, 2020, an	d May 19, 20:	21, the Defen	dant did, within the	e County of Perry and
ewhere, conspire to violate t	he provisions of Secti	on 911(b)(3) of the	Crimes Code, 18	Pa.C.S. § 91:	1(b)(3), perta	aining to Corrupt Or	rganizations, that is
ring the periods as set forth I	nerein, Defendant, w	ith the intent of pror	moting or facilitat	ting the comm	nission of the	crime of Corrupt O	organizations did
nspire and agree with other i	ndividuals, that they,	or one or more of t	hem, while emplo	oved by or as	sociated with	the enterprise set	forth berein would
nduct or participate, directly	or indirectly, in the co	onduct of the affairs	of the enterprise	through a pa	ittern of rack	eteering activity as	defined in 18 Pa.C.S.
1(h), in violation of Section 9	11(b)(4) of the Crime	es Code, 18 Pa.C.S.	§ 911(b)(4). Th	e pattern of r	acketeering o	consists of multiple	acts of violation of the
ntrolled Substance, Drug, De							
							•
nchoate	☐ Solicita	tion 🛛 Cons	niracy	Alessa	w of Mindian	A CO OI-I	
Offense 18 901 A	18 902 A			Numbe	er of victims	Age 60 or Older	
					1		
□ 3 780-1:	\ /\	CONTRACTOR CONTRACTOR	ITLE 35	1	F		<u> </u>
ead? Offense# Se PennDOT Data	ction Subsect Accident	tion	PA Statute (Title)	Counts	Grade	NCIC Offense C	ode UCR/NIBRS Co
	Number ———			☐ Interstate		Safety Zone	☐ Work Zone
(if applicable)	de the name of s	tatute or ordinan	ice): CRIMINA	L CONSPIRA	CY TO COM	MIT VIOLATION	S OF THE
atute Description (inclu	DRUG. DEVICE. ANI	D COSMETIC ACT,	SECTION 780-	·113 (A)(30)	OF ACT 64	(THE CONTROLL	ED SUBSTANCE,
atute Description (incluent of the control of the c	TC ACT)	ffense: Between J	uly 23, 2020, and	d May 19, 202	1, the Defen	dant. Nikolaus Andr	rowe with the intert
atute Description (inclu- INTROLLED SUBSTANCE, I RUG. DEVICE AND COSME Its of the accused associated	CIC ACT) clated with this O					ading innolado filidi	CVVO, VVIUT UTC ITIENE C
atute Description (incluent Introluent Intr	CIC ACT) clated with this O mission of a crime, o	lid agree with one o	r more other per	sons that the	or one or m	ore of them would	engage in conduct
atute Description (includent NTROLLED SUBSTANCE, INC. DEVICE AND COSMET AND C	CIC ACT) Clated with this O mission of a crime, o agree to aid such ot	lid agree with one o her person or persor	ns in the planning	a or commission	y or one or m on of such cri	ore of them would ime or of an attem	engage in conduct
Atute Description (includent NTROLLED SUBSTANCE, INC.) DEVICE AND COSMED AS OF the accused associating or facilitating the control constitutes a crime or didentity such crime, that is, at visual such crime, the crime such crime such crimes at the crime such crimes at the crimes at t	CIC ACT) clated with this O nmission of a crime, o agree to aid such otle arious locations in Pe	did agree with one o her person or persor rry County, Pennsylv	ns in the planning vania and elsewh	g or commissi ere, Defendar	y or one or m on of such cri nt did agree v	ore of them would ime or of an attemp with Robert Fowler.	engage in conduct pt or solicitation to Anthony Leming, Mar
atute Description (incluent NTROLLED SUBSTANCE, INC. DEVICE AND COSMET AND CO	ciaced with this O mission of a crime, of agree to aid such off arious locations in Pera a Reed, Chelsey Andr	lid agree with one o ner person or persor rry County, Pennsylv rews, Thomas Priar,	ns in the planning vania and elsewh Bradley Trump,	g or commissi ere, Defendar Douglas Farno	y or one or m on of such cri nt did agree v er, Barry Mell	ore of them would ime or of an attemp with Robert Fowler, norn, Scott Reabuck	engage in conduct pt or solicitation to Anthony Leming, Mar k, and others,: that the

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

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Defend	lant Nar	na'	First:			Middle:				ıst:		
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	4	780-1		(A)(30)	or the	TITLE 35		1		F		
Lead?	Offense		ection	Subsection		PA Statute	(Title)	Counts		Grade	NCIC Offense Code	e UCR/NIBRS Code
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CONTR	OLIFD S	HRSTANCE	· SECTION	1780-112 (A)	(30) OE AC	T 64 /THE C	OWLDUI	LED CUE	PU	70CE DDIN 22E22ION	G, DEVICE AND C	OCMETIC ACT
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Acts of	the acc	cused ass	ociated w	ith this Offer	nse: The d	efendant, Niko	laus And	rews, in N	1iddl	etown, Daur	ohin County, did kn	owingly possess with
the inter	ıt to deliv	er a controll	ed substanc	e, namely, Mar	ijuana & TH	C. a Schedule	I Control	led Subst	ance	. on or abou	it May 19, 2021. T	he said actor not then
			der the Con	trolled Substan	ce, Drug, De	evice and Cosr	netic Act,	Acto of A	\pril	14, 1972, oi	a practitioner regis	stered or licensed by
the appr	opriate St	ate Board.										
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Incho	and the second of the second of	Attempt		☐ Solicitation	□ 0	onspiracy		Num	ber (of Victims A	ge 60 or Older	
Offer	ıse	18 901 A	L	18 902 A	1:	8 903						
		1.25 (1.15)			- International constant							
	5	780	113	(A)(30)	of the	TITLE 35	5	1		F		
Lead?					275 HE - 27 House of the 25 House	4		ł .				
	Offens		Section ·	Subsection		PA Statute	(Title)	Counts	3	Grade	NCIC Offense Cod	le UCR/NIBRS Code
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Docket Number: Date Filed:		OTN/LiveScan Number	Complaint/Incident Number BN3200109XM
	First:	Middle:	Last:
Defendant Name:	NIKOLAUS	JOHN	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 that non-confidential information and documents.

of Pennsylvania and were c	ontrary to the Act(s) of the A t can be issued, an affiday	after, were against the peace and dignity of the Commonwealth Assembly, or in violation of the statutes cited. vit of probable cause must be completed, sworn to before the
		#671
(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.

(Magisterial District Court Number)

SEAL

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

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

Date Date My commission expires first Monday of January, 20214

SEAL

COMMORWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF:PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 VS. MDJ: Hon, Elizabeth R. Frownfelter (NAME and ADDRESS): . Address: 3553 Shermans Valley Road BARRY MELHORN First Name Middle Name Last Name Loysville, PA 17047 302 W. Juniata Parkway Millerstown, PA 17062 Telephone: (717)789-4117 NCIC Extradition Code Type 1-Felony Full C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition ☐ A-Misdemeanor Full ☐ 3-Felony Surrounding States ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ■ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number** Date Filed · OTN/LiveScan Number Complaint/Incident Number Services? R 168 960-1 8 129121 BN3200109XM Co-Defendant(s) ров 11/02/1962 Add'I DOB Middle Name Last Name . Male First Name ☐ Female AKA Black RACE White ■ Asian Native American Unknown ETHNICITY Unknown Hispanic Non-Hispanic

SDY (Sandy)

☐ WHI (White)

MNU Number

Registration

Sticker (MM/YY)

Make

BRO (Brown)

PNK (Pink)

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 08/22/2021

DEFENDANT VEHICLE INFORMATION

(Name of the attorney for the Commonwealth)

AGENT KURT ZITSCH

GRY (Gray)

BLK (Black)

BLK (Black)

HAZ (Hazel)

Defendant Fingerprinted

Fingerprint Classification:

☐ BLN (Blonde / Strawberry)

Hair

Eye Color

DNA

Plate #

ViN

FBI Number

Color

RED (Red/Aubn.)

☐ YES ☐ NO

Haz

mat

BLU (Blue)

MAR (Maroon)

DNA Location

Year

(County Code)

ONG (Orange)

☐ YES ☐ NO

591266JA0

(Signature of the attorney for the Commonwealth)

BNIDC - #621

BLU (Blue)

XXX (Unk./Bald)

Comm'l Veh.

Ind.

Model

GRN (Green)

MUL (Multicolored)

PLE (Purple)

GRN (Green)

School Veh.

Style

(Date)

Ge

☐ YES ☐ NO

BRO (Brown)

WEIGHT (lbs.)

Ft. HEIGHT In.

9

Reg.

same

as Def.

PNK (Pink)

150

GRY (Gray)

Oth, NCIC Veh. Code

Color

Gen.

(Name of the Affiant)		(PSP/MPOETC -Assigned Affiant ID Number & Badge #
f Pennsylvania Offic	e of Attorney General	PA0222400
(Identify Department or Agency Rodo hereby state: (check ap	tepresented and Political Subdivision)	(Police Agency ORI Number)
 I accuse the above nar 	med defendant who lives at the addre	ss set forth above
☐ I accuse the defendant	t whose name is unknown to me but w	/ho is described as
	•	
	t whose name and popular designations S John Doe or Jane Doe	n or nickname are unknown to me and whom I have
therefore designated as		Ivania at [214] Various Locations
therefore designated as	s John Doe or Jane Doe	

	ħ						AND P	OLICE	CRIMINA	L COMPLAINT
Docket Number:		Date I	Filed:	0	TN/LiveScan	Numb	ėr		plaint/Incident 3200109XM	Number
Defendant Name		First: BARRY	, .	•	Middle:		I .	Last: MELHORN	J	
-									,	
When there is no (Set forth a brief su without more, is no	nore that mmary of t sufficien m at the tir	n one of the facts s t. In a sum me of the	fense, eac sufficient to a nmary case, y offense may	ch offense sladvise the defe you must cite the be included if h	nould be nun ndant of the nat ne specific sect known. In additi	nberecture of the longs of the	chronolo ne offense(s nd subsecti al security	ogically. s) charged. A on(s) of the s numbers and	citation to the sta tatute(s) or ordin financial informa	olated, if appropriate. atute(s) allegedly violated, ance(s) allegedly violated. ation (e.g. PINs) should not
	Attempt 8 901 A		☐ Solicitati 18 902 A		Conspiracy 18 903			Number of	f Victims Age 60	or Older
⊠ 1	911		(B)(3)	of the	TITLE 18		1	F1	· · · · · · · · · · · · · · · · · · ·	
Lead? Offense #	Sec	ction	Subsectio	n	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Da		ccident N	umber				Interstate		Safety Zone	☐ Work Zone
Statute Descrip		ude the	name of s	tatute or orc	linance): co r	RUPT	ORGANIZA	ATIONS		
directly or indirectly violation of Title 18 Cosmetic Act. 35 P.	in the affa PA. C.S. 9 S. § 780-1	airs of said 11 (B) (3) 13(a) (30)	d enterprise t . The patterr), specifically Solicitati	hrough a patte n of racketeerin to include, but	rn of racketeeri g consists of mo not limited to. Conspiracy	ng activ ultiple a	ity as define cts of violat	ed in Title 18 ion of the Cor ed in this com	Pa.C.S. § 911(h)(ntrolled Substance plaint.	lld conduct or participate (1) all of which is in e, Drug, Device and or Older
Offense 1	8 901 A		18 902 A	1 E	8 903					
□ 2	911		(B)(4)	of the	TITLE 18		1	F1	NCIC Offense	• .
Lead? Offense#		ation	Subsectio	n	PA Statute (Title)	Counts	Grade	Code	. UCR/NIBRS Code
PennDOT Dat (if applicable) (ccident Ni	\$2555555	.			nterstate	<u> </u>	Safety Zone	☐ Work Zone
Organizations, did o	ised ass sewhere, o is, during conspire an act or parti , in violatio	ociated conspired the period ad agree w icipate, dir on of Secti	with this C to violate the s as set forth ith other ind rectly or indir ion 911(b)(4)	Offense: Betwee provisions of 3 nerein, Defen ividuals, that the coty, in the co	een July 23, 20 Section 911(b)(dant, with the in ney, or one or m nduct of the aff Code, 18 Pa.C.	20, and 3) of the ntent of nore of t airs of ti 5. § 911	May 19, 20 e Crimes Co promoting hem, while he enterpris (b)(4). Th	21, the Defer de, 18 Pa.C.S or facilitating employed by se through a p	 § 911(b)(3), pe the commission of or associated with pattern of rackete 	the County of Perry, rtaining to Corrupt of the crime of Corrupt th the enterprise set forth ering activity as defined in ists of multiple acts of
	Attempt		☐ Solicitat		Conspiracy 18 903		Numb	er of Victims	Age 60 or Older	
	18 901 A						<u> </u>		······································	
Inchoate Offense		113	(A)(3	O) of the	TITLE 35		1	F		
Offense 3 Lead? Offense#	780-1	Section	(A)(30	- / Evasiveriti	TITLE 35 PA Statute		1 Counts	F Grade	NCIC Offense	Code UCR/NIBRS Code
Offense	780-1	Section Accide Numbe	Subsection 1	tion	PA Statute	(Title)	Counts Interstate	Grade	☐ Safety Zone	☐ Work Zone

AOPC 412A - Rev. 7/18

Docket i	Numbe	r:	Date	Filed:		то	'N/LiveScar	ı Nu	mbei		Complaint/Incident Number BN3200109XM			
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			• .											
Inchoate ☐ Attempt ☐ Solicitation Offense 18 901 A 18 902 A					903			Numbe	er of V	ictims A	ge 60 or Older			
	4	780-1	13	(A)(· /	of the	TITLE 35		<u>}</u>	1	F			
Lead?	Offense nDOT I		ection Accide		section		PA Statute	(Title)		Counts Interstate		Grade	NCIC Offense Code Safety Zone	UCR/NIBRS Code ☐ Work Zone
(if a	pplical	ole)	Numb	er —	£ _1_1,1_	الموم مي	nanaa): BB	OLIY.			DOCC		· · · · · · · · · · · · · · · · · · ·	
CONTRO	LLED S	ption (inc UBSTANC E	iude in :: SECTI	e name o :0N 780-1 :	r statute 13 (A)(3 0) OF AC	T 64 (THE C	CONT	ROL	ED SUB	STAN	CE, DRU	WITH INTENT TO G, DEVICE AND C	OSMETIC ACT)
intent to d and there	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.													
Inchoa Offens		☐ Attemp 18 901 /		☐ Solid			Conspiracy 8 903			Numb	er of	Victims	Age 60 or Older _	
	5	780-		. ,	(30)	of the	TITLE 3		>	1 Counts	F	Grade	NCIC Offense Co	de UCR/NIBRS Code
	Offens InDOT applica	Data	Section Accid	dent	bsection		PA Statut	e (m		Interstate			Safety Zone	✓ ☐ Work Zone
Statute	Descri	ption (inc	lude th	e name o	of statute 13 (A)(30	or ordi	nance): PR	OHI	BITE	D ACTS: LED SUBS	POSS STAN	ESSION CE, DRU	WITH INTENT TO G, DEVICE AND C	DELIVERY A OSMETIC ACT)
Acts of t	the acc deliver a lstered u	cused ass controlled s	ociated	d with this	s Offens Marijuana.	e: The d	efendant, Bar ule I Controlle	ry Me	elhorn ibstan	, in Miller: ce, on or	stown, about	, Perry Co May 19,	ounty, did knowingly	possess with the portion of their
													•	4
Inchoa Offens		Attempt 18 901 A		☐ Solici 18 902			onspiracy 903			Numbe	er of V	ictims A	ge 60 or Older	
					Ž.	of the			T			<u>.</u>		
Lead?	Offense		ection	7	section		PA Statute	(Title))	Counts		Grade	NCIC Offense Code	
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Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
	. / /			BN3200109XM
	First:	Middle:	Last:	
Defendant Name:	BARRY		MELI	HORN

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

The acts committed by the accused, as listed and herea	after, were against the	peace and dignity of the	e Commonwealth
of Pennsylvania and were contrary to the Act(s) of the A			
(Before a warrant of arrest can be issued, an affidav	it of probable cause	must be completed, s	sworn to before the
issuing authority, and attached.)	•		
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(Date)

AND NOW, on this date

S/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.

(Issuing Authority)

41-3-05 (Ca

(Magisterial District Court Number)

SEAL

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

Sworn to me and subscribed before me this 39 day of August 2021

Date Magisterial District Judge

My commission expires first Monday of January, 2024

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: PERRY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 41-3-05 VS. MDJ: Hon. Elizabeth R. Frownfelter (NAME and ADDRESS): Address: 3553 Shermans Valley Road MICHAEL THOMAS **ROWELLO** Loysville, PA 17047 First Name Middle Name Last Name Ge 445 Spring Street Danville, PA 17821 Telephone: (717)789-4117 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Services? CR-427-ZI 8129121 K 168962-3 ☐ YES BN3200109XM **GENDER** ров 10/17/1976 Add'l DOB Co-Defendant(s) Male First Name Middle Name Last Name Gen. ☐ Female AKA ☑ White ☐ Hispanic RACE Asian Black Native American Unknown ETHNICITY Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) Eye GRN (Green) GRY (Gray) HAZ (Hazei) Color MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA **DNA** Location ☐ YES ☐ NO WEIGHT (lbs.) FBI Number 774941FD2 **MNU Number** 235 **Defendant Fingerprinted** ☐ YES ☐ NO Ft. HEIGHT In, Fingerprint Classification: 11 DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Reg. Plate # mat Ind. Sticker (MM/YY) same П as Def. VIN Year Make Model Style Color Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG ROBERT SMULKTIS 08/22/2021 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) AGENT KURT ZITSCH BNIDC - #621 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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

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

IOPC 412A - Rev. 7/18

in PERRY County

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [214]

[501

Various Locations
(Place-Political Subdivision)

A F	POLICE	CRIMINAL	COMPL	AIN
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Docket Num	ber:	Date Fi	led: /	ОТІ	N/LiveScan I	Numbe	r			laint/Incident 200109XM	Numl	per
Defendant N	lame:	First: MICHAE	L		Middle: THOMAS		I .	Last: ROWE	ELLO			
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When there (Set forth a br. without more, The age of the	is more that lef summary of is not sufficient victim at the ti	n one offe the facts su t. In a summ	ense, each o officient to advis	ffense sho se the defend nust cite the ncluded if kn	ould be num lant of the nati specific sections own. In addition	nbered ure of the on(s) and on, socia	chronolo e offense(s d subsection d security r	gically chargon(s) of number	/. ed. A c the sta s and f	itation to the sta stute(s) or ordina inancial informa	tute(s) ince(s)	, if appropriate. allegedly violated, allegedly violated. g. PINs) should not
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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												
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(if applic	able) "	ccident Nur	\$350.55	_			nterstate			Safety Zone		☐ 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	18 901 A		Solicitation 18 902 A	18	onspiracy 903	Numbe		er of Victims Age 60 or Older				
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PennDC)T Data	Section Accident			PA Statute (\	Counts Interstate		rade L	NCIC Offense Safety Zone	Code	UCR/NIBRS Code 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,												
Acts of the promoting or f which constitu such crime, the Nikolaus Andre or more of the	acilitating the c tes a crime or c at is, at various ws, Oksana Re m. would engag	ociated wommission of the commission of the commission of the commission of the conduction of the cond	rith this Offer of a crime, did a aid such other I Perry County, I Andrews, Thon ct constituting n	igree with on person or pe Pennsylvania nas Priar, Bra nultiple violal	ne or more oth rsons the plan and elsewher adley Trump, E tions of the Co	er perso ning or o e, Defen Douglas I ontrolled	ns that the commission dant did ag Farner, Bar Substance	y or one of such gree wit ry Melh Drug, E	e or mo n crime th Robe orn, So Device	ore of them woul or of an attemp ort Fowler, Antho	d enga t or sol ny Lem 1 other t, 35 P.	icitation to commit ning, Marc Bankes, s,; that they, or one S. § 780-113(a)

AOPC 412A - Rev. 7/18

POLICE CRIMINAL COMPLAINT Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number BN3200109XM First: Middle: Last: Defendant Name: **MICHAEL** THOMAS **ROWELLO** Inchoate ☐ Attempt ☐ Solicitation Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 of the 780-113 (A)(30)TITLE 35 Lead? Offense# Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) 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. Inchoate ☐ Attempt ☐ Solicitation Conspiracy Number of Victims Age 60 or Older _ 18 901 A Offense 18 902 A 18 903 5 7512 of the TITLE 18 1 F3 Lead? Offense# Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) Number 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) Inchoate ☐ Attempt □ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 of the

Docket Number: Date Filed:		OTN/LiveScan Number	Complaint/I	ncident Number 09XM				
Defendant Name:	First: MICHAEL	Middle: THOMAS	Last: ROWELLO	,				

- 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 that non-confidential information and documents.

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

(Issuing Authority)

(Date)

AND NOW, on this date

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

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

41-3-05 (Magisterial District Court Number)

SEAL

(Signature of Affiant

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 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.

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

Date

My commission expires first Monday of January, 324

SEAL

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, heroin, heroin, heroin laced with fentanyl and marijuana 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 redistributors, 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 Mechanicsburg, 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 Ct 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

THC is a Schedule 1 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 resupply 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 Mutzabuigh'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 Ediner and Reed during the early morning hours of April 10, 2021 revealed that he had just obtained the controlled substances.

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." Farner asked Fowler not to forget about him and increased his typical order to six ounces. Fowler informed Farner 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, $+\omega$ Fowler left the residence and returned the Reed's vehicle before departing the area.

Fowler and Farner 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, Farner stated to Fowler, "These people are owned by this substance, bro." Fowler replied, "Yeah, I know." Farner 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, Farner, using coded language, inquired if Fowler could provide him with methamphetamine. Fowler indicated that he could. At 2:39 p.m., Fowler informed Farner 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 Farner he would contact him on his way back. Farner asked Fowler how much he (Farner) 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 Elliottsburg, Perry County; and, 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 Psyllocybin⁶ 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

Psyilocybin 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; 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 telphones; \$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 though 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 Transadol 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 Farner. 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 Leming 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,