

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY



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

MDJ: Hon. JEFFREY L HERBST  
Magisterial District Number: 05-2-07  
Address: PARKWAY BUILDING, SUITE 1500  
339 OLD HAYMAKER ROAD  
MONROEVILLE, PA 15146  
Phone: 412.372.1125

DEFENDANT: (NAME and ADDRESS):  
TERRI WILSON  
First Name Middle Name Last Name Gen.  
813 COLLINS ST. PITTSBURGH, PA 15206

NCIC Extradition Code Type

Felony - Extradition Surrounding States Only  
Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>05-2-07-0005-2022</i>	Date Filed <i>5-26-22</i>	OTN/LiveScan Number G 909983-4	Complaint/Incident Number ASAP-670328/GVS220017	Request Lab Services? <input type="checkbox"/> Yes
GENDER FEMALE	DOB 11/04/1976	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>
RACE BLACK	First Name	Middle Name	Last Name	Gen.
ETHNICITY	AKA			
HAIR COLOR BLK (BLACK)	EYE COLOR BRO (BROWN)		WEIGHT (lbs.)	
DNA	DNA Location		300	
FBI Number	MNU Number	Ft. HEIGHT In.		
Defendant Fingerprinted			5	07
Fingerprint Classification				

DEFENDANT VEHICLE INFORMATION

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

Office of the attorney for the Commonwealth  Approved  Disapproved because: \_\_\_\_\_

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

name of the attorney for the Commonwealth (Signature of the attorney for the Commonwealth) (Date)

I, ZACHARY WEBB / Corey Cochran 44947 / 301853  
(Name of the Affiant) (PSP/MP/POETC - Assigned Affiant ID Number & Badge #)  
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 446 MONROEVILLE BORO  
(Subdivision Code) (Place-Political Subdivision)  
In Allegheny County 02 on or about 08/07/2020 12:00  
(County Code)

MAY 26 2022



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909983-4	Complaint/Incident Number ASAP-670328/GVS220017
Defendant Name	First: TERRI	Middle:	Last: WILSON

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
X	1	6111	C	of the	18	2	F2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 6111C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS F2 2 COUNTS									
The actor, not a licensed importer, manufacturer or dealer, sold or transferred a firearm to another unlicensed person and failed to make such transfer at the place of business of a licensed importer, manufacturer, dealer or county sheriff's office, where the actor has been previously convicted of a violation of Section 6111, in violation of 18 Pa. C.S. §6111(c) and (h)(1).									
The actor, not a licensed importer, manufacturer or dealer, sold or transferred a firearm to another unlicensed person and failed to make such transfer at the place of business of a licensed importer, manufacturer, dealer or county sheriff's office, where the actor has been previously convicted of a violation of Section 6111, in violation of 18 Pa. C.S. §6111(c) and (h)(1).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
	2	4911	A1	of the	18	2	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 4911A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION F3 2 COUNTS									
The actor knowingly made a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, namely Falsified ATF Form 4473 question 21.a., with the intent to defraud or injure another, in violation of 18 Pa. C.S. §4911(a)(1) and (b).									
The actor knowingly made a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, namely Falsified ATF Form 4473 question 21.a., with the intent to defraud or injure another, in violation of 18 Pa. C.S. §4911(a)(1) and (b).									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909983-4	Complain/Incident Number ASAP-670328/GVS220017
Defendant Name	First: TERRI	Middle:	Last: WILSON

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	4904	B	of the	18	2	M3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
<p>18 4904B UNSWORN FALSIFICATION TO AUTHORITIES M3 2 COUNTS</p> <p>The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor Falsified ATF Form 4473 question 21.a., in violation of 18 Pa. C.S. §4904(b).</p> <p>The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor Falsified ATF Form 4473 question 21.a., in violation of 18 Pa. C.S. §4904(b).</p>									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909983-4	Complaint/Incident Number ASAP-670328/GVS220017
Defendant Name	First: TERRI	Middle:	Last: WILSON

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

\_\_\_\_\_ 05/25/2022 \_\_\_\_\_

/ZACHARY WEBB/  
 (Signature of Affiant)

AND NOW, on this date 5/26/22 (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.

05-2-07  
 (Magisterial District Court Number)

(Issuing Authority)

**JEFFREY L. HERBST,  
 MAGISTERIAL DISTRICT JUDGE  
 MAGISTERIAL DISTRICT 05-2-07  
 MY COMMISSION EXPIRES ON THE  
 FIRST MONDAY IN JANUARY, 2024**



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909983-4	Complaint/Incident Number ASAP-670328/GVS220017
Defendant Name	First: TERRI	Middle:	Last: WILSON

## AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:  
2/9/2022
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:  
2/9/2022

2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):  
Defendant's admissions
- b) How the source of information knows this particular person committed the crime:  
Defendant's admissions
- c) How both Affiant and/or source of information knows that a particular crime has been committed:  
Defendant's admissions

3. WHAT CRIMES:

18 6111 C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS  
 18 6111 C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS  
 18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES  
 18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES  
 18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION  
 18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION

4. WHERE CRIME(S) COMMITTED:

ALLEGHENY COUNTY, PA

5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

- Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.  
 Source has given information in the past which has led to arrest and/or conviction  
 Defendant's reputation for criminal activity  
 This source made declaration against his/her penal interest to the above offense
- Affiant and/or other Police Officers corroborated details of the information



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909983-4	Complaint/Incident Number ASAP-670328/GVS220017
Defendant Name	First: TERRI	Middle:	Last: WILSON

Your Affiant, Agent Zachary Webb (NA Webb), being duly sworn, deposes and says, I am a Narcotics Agent employed by the Office of Attorney General, Bureau of Narcotics Investigation and Drug Control (OAG-BNI) assigned to the Gun Violence Section (GVS). As such, I am tasked with investigating violations of the Pennsylvania Crimes Code including Violations of the Uniform Firearms Act (18 PA.C.S.A. §6105, §6106), illegal firearm transfers straw purchases (18 PA.C.S.A. §6111), and violations of the Controlled Substance, Drug Device and Cosmetic Act of April 1972, P.L. 233, No. 64, 35 P.S. §780-101 et. seq., Corrupt Organizations (18 PA.C.S.A. §911) and charges recommended by a statewide investigating grand jury. Your Affiant completed the Class "A" Pennsylvania State Police Wiretapping and Electronic Surveillance Training School as mandated in Section 5742 of Act 18, Pa.C.S.A., 5701 et seq.

Prior to this position, your Affiant was employed by the Pittsburgh Bureau of Police from March, 2016 through October, 2021. Your Affiant completed Act 120 Training through the City of Pittsburgh. During this time, your Affiant has made hundreds of arrests, which included Violations of the Uniformed Firearms Act, and authored and executed multiple search warrants for vehicles, cell phones, and residences. Your Affiant has received specialized training in interviewing/interrogation, search and seizure, and was certified as a Training Instructor.

Your co-affiant, Officer Corey Cochran, MPOETC No. 301853, is a law enforcement officer of the Commonwealth of Pennsylvania within the meaning of Section 5702 of the Pennsylvania Crimes Code and, as such, are empowered to make arrests for criminal offenses enumerated therein. All of the information contained in this affidavit was learned directly by your affiant, or was communicated to them by other law enforcement officers. Officer Cochran has been a police officer with the Commonwealth of Pennsylvania since 2017 and a Police Officer with the Pittsburgh Bureau of Police since that time. Officer Cochran has received training and education sponsored by the Pittsburgh Bureau of Police Academy and elective training through the Northeast Counterdrug Training Center, Professional Law Enforcement Training, Six Layer Concepts and Consulting and the Institute for Law Enforcement Education. Officer Cochran is certified in 28 CFR Part 23, the Bureau of Justice Assistance's Criminal Intelligence Systems Operating Policies. Officer Cochran's elective training has focused on law enforcement intelligence, interviewing and interrogation, undercover policing, proactive police work, social media networking, and narcotics enforcement. In this time Officer Cochran has been involved in numerous investigations including but not limited to: firearms violations, narcotics, robberies, aggravated assaults, non-fatal shootings, stolen vehicles, and carjackings. Officer Cochran has personally been involved in numerous arrests including physical arrests, probable cause searches, and the application and the execution of search and arrest warrants. Officer Cochran has assisted outside agencies, both Federal, local, and state agencies.

In your Affiant's training, knowledge and experience, your Affiant knows that the purchase of multiple firearms, sometimes on the same day, some of the same exact type, purchased in a short amount of time, is a strong indicator of straw purchasing, illegal transfer of firearms and criminal activity. Whenever handguns are sold or transferred as per Federal and Pennsylvania State laws a background check is required and this transaction must be conducted through a Federal Firearms Licensee (FFL). Whenever handgun purchases or transfers are completed through an FFL and the firearm is then transferred to someone else, (not utilizing a FFL or a background check) this is commonly referred to as a "Straw Purchase" meaning an intentional act to avoid a lawful purchase or transfer and a violation of Pennsylvania Crimes Code Section 6111 Sale or Transfer of Firearms.

On February 9, 2022, your Affiant was contacted by Officer P. Szalla of the Pittsburgh Bureau of Police (PBP), Zone 5. Officer Szalla informed your Affiant about a series of VUFA arrests that involved Teri WILSON (T. WILSON) and her husband, Deion WILSON (D. WILSON). Of these arrests, Officer Szalla directed me to two specific incidents that occurred on October 21, 2020 and November 4, 2020.

On October 21, 2020, Pittsburgh Police Officers responded to a report of two males waving and flashing firearms at the intersection of Sterrett and Bennett Streets in Pittsburgh. During the course of the investigation, Officers came into contact with D. WILSON and attempted to stop him. D. WILSON fled from Officers on foot. While fleeing, Officers observed a firearm protruding



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Defendant Name	First: TERRI	Middle:	Last: WILSON

from D. WILSON's right jacket pocket. D. WILSON was ultimately detained and a black Heckler & Koch 45 caliber handgun (SER: HKU-050402) was recovered. D. WILSON was subsequently arrested for VUFA and related offenses.

On November 4, 2020, Pittsburgh Police Officers responded to a Shot Spotter alert at 7901 Frankstown Avenue in Pittsburgh. At this location, Officers located a black Ford Explorer parked on the road. Officers observed D. WILSON standing at the driver side of this vehicle while his wife, T. WILSON, was sitting in the driver's seat of the vehicle. During the course of the investigation, Officers located a black Smith & Wesson 38 Special revolver (SER: CVF7478) partially under the driver's seat. Officers located four live rounds and one fired cartridge casing inside the revolver. A female witness arrived on the scene and informed Officers that she observed D. WILSON in possession of a firearm and observed him fire the weapon. T. WILSON would later state that she was walking away from D. WILSON, who was standing at the vehicle, and heard the shot go off. T. WILSON was found to possess a valid conceal carry license and was arrested for possession of cocaine. D. WILSON was arrested for VUFA and related offenses.

State and local databases confirmed that T WILSON has purchased at least three firearms:

- AMR .380 (SER: GP21503) DOS: 2/9/2015 Braverman Arms.
- Heckler & Koch .45 pistol (SER: HKU-050402) DOS: 8/7/2020 Dunham's Sports  
-Recovered from D. WILSON on October 21, 2020.
- Smith & Wesson .380 Special (SER: CVF7478) DOS: 8/17/2020 Dunham's Sports  
-Recovered from D. WILSON on November 4, 2020.

On Friday, February 11, 2022, Officer Szalla (PBP), Officer Cochren (PBP), Supervisory Narcotics Agent Sinisi (GVS), and I met at the Pittsburgh Bureau of Police Zone 5 Station wherein we took T. WILSON and D. WILSON into custody on outstanding arrest warrants.

SNA Sinisi and I provided T. WILSON with a Miranda Waiver, which she read, signed, and dated. Agents then proceeded with a recorded interview. T. WILSON stated that she purchased three firearms as listed above. Of these firearms, T. WILSON stated that she purchased two of these firearms for D. WILSON.

In regards to the purchase of the H&K .45 pistol, T. WILSON stated that D. WILSON was present while purchasing the firearm from Dunham's Sports (3700 William Penn Highway, Monroeville, PA 15146). T. WILSON stated that D WILSON gave her "a couple hundred dollars" to purchase the firearm. I asked T. WILSON if D. WILSON had permission and access to use the firearm, to which T. WILSON stated "Yes." Therefore, T. WILSON falsified ATF Form 4473 by answering "YES" to question 21.a., "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s) ATF Form 5300.9A?"

In regards to the Smith & Wesson .380 Special, T. WILSON stated that D. Wilson was also with her during the purchase. T. WILSON denied that D. WILSON gave her any money for this transaction. I again asked T. WILSON if D WILSON had permission to use the gun as he saw fit, to which T. WILSON stated "Yes." I inquired into her and D. WILSON's arrest on November 4, 2020, wherein Pittsburgh Police charged D. WILSON with possession of this firearm. I asked T. WILSON if D. WILSON was in possession of the firearm and if he fired one shot, to which T. WILSON stated, "Yes". Therefore, T. WILSON falsified ATF Form 4473 by answering "YES" to question 21.a., "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s) ATF Form 5300.9A?"

Agents asked T. WILSON if she was aware of D. WILSON's criminal history or if she knew he was unable to possess/purchase a firearm, to which T. WILSON stated "Yes." Agents review D. WILSON's criminal history and confirmed that he is prohibited from possessing a firearm due to the following convictions:

- 13(A)(30) Manufacture of a Controlled Substance (F), Plead Guilty (OTN C606125-2).
- 2702 Aggravated Assault (F1), Found Guilty (OTN C825636-0).





MAY 26 2022

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

MDJ: Hon. JEFFREY L HERBST  
Magisterial District Number: 05-2-07  
Address: PARKWAY BUILDING, SUITE 1500  
339 OLD HAYMAKER ROAD  
MONROEVILLE, PA 15146  
Phone: 412.372.1125

DEFENDANT: (NAME and ADDRESS):  
JALAA N WILLIAMS  
First Name Middle Name Last Name Gen.  
20G MIDWAY DR. WEST MIFFLIN, PA 15122

NCIC Extradition Code Type

Felony - Extradition Surrounding States Only  
Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>0247-20-5-26-22</i>	Date Filed <i>5-26-22</i>	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019	Request Lab Services? <input type="checkbox"/> Yes
GENDER FEMALE	DOB 07/21/1993	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>
RACE BLACK	First Name	Middle Name	Last Name	Gen.
ETHNICITY	AKA			
HAIR COLOR BLK (BLACK)	EYE COLOR BRO (BROWN)		WEIGHT (lbs.)	
DNA	DNA Location			
FBI Number	MNU Number		Fl. HEIGHT In.	
Defendant Fingerprinted				
Fingerprint Classification				

DEFENDANT VEHICLE INFORMATION

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

Office of the attorney for the Commonwealth  Approved  Disapproved because: \_\_\_\_\_

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

name of the attorney for the Commonwealth (Signature of the attorney for the Commonwealth) (Date)

I, ZACHARY WEBB / Corey Cochran 44947 / 301853  
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

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 446 MONROEVILLE BORO  
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County 02 on or about 11/07/2018 12:00  
(County Code)



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAAAN	Middle:	Last: WILLIAMS

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

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
X	1	6111	C	of the	18	5	F2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 6111C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS F2 5 COUNTS									
The actor, not a licensed importer, manufacturer or dealer, sold or transferred a firearm to another unlicensed person and failed to make such transfer at the place of business of a licensed importer, manufacturer, dealer or county sheriff's office, where the actor has been previously convicted of a violation of Section 6111, in violation of 18 Pa. C.S. §6111(c) and (h)(1).									
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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAAAN	Middle:	Last: WILLIAMS

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Lead?	2	4911	A1	of the	18	7	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description/Acts of the accused associated with this Offense:

18 4911A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION F3 7 COUNTS

The actor knowingly made a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, namely falsified ATF form 4473 questions 21.a. & 21.e., with the intent to defraud or injure another, in violation of 18 Pa. C.S. §4911(a)(1) and (b).

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The actor knowingly made a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, namely falsified ATF form 4473 questions 21.a. & 21.e., with the intent to defraud or injure another, in violation of 18 Pa. C.S. §4911(a)(1) and (b).

The actor knowingly made a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, namely falsified ATF form 4473 questions 21.a. & 21.e., with the intent to defraud or injure another, in violation of 18 Pa. C.S. §4911(a)(1) and (b).

The actor knowingly made a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, namely falsified ATF form 4473 questions 21.a. & 21.e., with the intent to defraud or injure another, in violation of 18 Pa. C.S. §4911(a)(1) and (b).



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAN	Middle:	Last: WILLIAMS

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	4906	B1	of the	18	1	M2	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 4906B1 FALSE REPORTS TO LAW ENFORCEMENT AUTH - Fictitious Reports M2 1 COUNT The actor reported to law enforcement authorities an offense or other incident within their concern knowing that it did not occur, namely filed a false burglary report in order to claim that her firearms were stolen, as to a false report of the theft or loss of the firearm, as defined in section 5515, in violation of 18 Pa. C.S. §4906(b)(1) and (c)(2).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	4	6111	C	of the	18	2	M2	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 6111C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS M2 2 COUNTS The actor, not a licensed importer, manufacturer or dealer, sold or transferred a firearm to another unlicensed person and failed to make such transfer at the place of business of a licensed importer, manufacturer, dealer or county sheriff's office, in violation of 18 Pa. C.S. §6111(c). The actor, not a licensed importer, manufacturer or dealer, sold or transferred a firearm to another unlicensed person and failed to make such transfer at the place of business of a licensed importer, manufacturer, dealer or county sheriff's office, in violation of 18 Pa. C.S. §6111(c).									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAAN	Middle:	Last: WILLIAMS

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	5	4904	B	of the	18	7	M3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
PenndOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				

Statute Description/Acts of the accused associated with this Offense:

18 4904B UNSWORN FALSIFICATION TO AUTHORITIES M3 7 COUNTS

The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor Falsified ATF Form 4473 question 21.a. & 21.e., in violation of 18 Pa. C.S. §4904(b).

The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor Falsified ATF Form 4473 question 21.a. & 21.e., in violation of 18 Pa. C.S. §4904(b).

The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor Falsified ATF Form 4473 question 21.a. & 21.e., in violation of 18 Pa. C.S. §4904(b).

The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor Falsified ATF Form 4473 question 21.a. & 21.e., in violation of 18 Pa. C.S. §4904(b).

The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor Falsified ATF Form 4473 question 21.a. & 21.e., in violation of 18 Pa. C.S. §4904(b).

The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor Falsified ATF Form 4473 question 21.a. & 21.e., in violation of 18 Pa. C.S. §4904(b).

The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor Falsified ATF Form 4473 question 21.a. & 21.e., in violation of 18 Pa. C.S. §4904(b).



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAN	Middle:	Last: WILLIAMS

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

\_\_\_\_\_ 05/25/2022 \_\_\_\_\_

/ZACHARY WEBB/  
(Signature of Affiant)

AND NOW, on this date 5/26/22 (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.

05-2-07  
(Magisterial District Court Number)

(Issuing Authority)

**JEFFREY L. HERBST,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-07  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2024**



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAAN	Middle:	Last: WILLIAMS

## AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:  
2/15/2022
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:  
2/15/2022

2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):  
Defendant's admission
- b) How the source of information knows this particular person committed the crime:  
Defendant's admission
- c) How both Affiant and/or source of information knows that a particular crime has been committed:  
Defendant's admission

3. WHAT CRIMES:

18 6111 C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS  
18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION  
18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION  
18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES  
18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES  
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18 6111 C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS  
18 6111 C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS  
18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION  
18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION  
18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION  
18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION  
18 4906 B1 FALSE REPORTS TO LAW ENFORCEMENT AUTH - Fictitious Reports  
18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION  
18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES  
18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES  
18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES  
18 6111 C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS  
18 6111 C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS  
18 6111 C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS  
18 6111 C SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAAN	Middle:	Last: WILLIAMS

4. WHERE CRIME(S) COMMITTED:

ALLEGHENY COUNTY, PA

5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

- X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.  
Source has given information in the past which has led to arrest and/or conviction  
Defendant's reputation for criminal activity  
This source made declaration against his/her penal interest to the above offense
- X Affiant and/or other Police Officers corroborated details of the information





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complain/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAAN	Middle:	Last: WILLIAMS

Your Affiant, Agent Zachary Webb (NA Webb), being duly sworn, deposes and says, I am a Narcotics Agent employed by the Office of Attorney General, Bureau of Narcotics Investigation and Drug Control (OAG-BNI) assigned to the Gun Violence Section (GVS). As such, I am tasked with investigating violations of the Pennsylvania Crimes Code including Violations of the Uniform Firearms Act (18 PA.C.S.A. §6105, §6106), illegal firearm transfers straw purchases (18 PA.C.S.A. §6111), and violations of the Controlled Substance, Drug Device and Cosmetic Act of April 1972, P.L. 233, No. 64, 35 P.S. §780-101 et. seq., Corrupt Organizations (18 PA.C.S.A. §911) and charges recommended by a statewide investigating grand jury. Your Affiant completed the Class "A" Pennsylvania State Police Wiretapping and Electronic Surveillance Training School as mandated in Section 5742 of Act 18, Pa.C.S.A., 5701 et seq.

Prior to this position, your Affiant was employed by the Pittsburgh Bureau of Police from March, 2016 through October, 2021. Your Affiant completed Act 120 Training through the City of Pittsburgh. During this time, your Affiant has made hundreds of arrests, which included Violations of the Uniformed Firearms Act, and authored and executed multiple search warrants for vehicles, cell phones, and residences. Your Affiant has received specialized training in interviewing/interrogation, search and seizure, and was certified as a Training Instructor.

Your co-affiant, Officer Corey Cochran, MPOETC No. 301853, is a law enforcement officer of the Commonwealth of Pennsylvania within the meaning of Section 5702 of the Pennsylvania Crimes Code and, as such, are empowered to make arrests for criminal offenses enumerated therein. All of the information contained in this affidavit was learned directly by your affiant, or was communicated to them by other law enforcement officers. Officer Cochran has been a police officer with the Commonwealth of Pennsylvania since 2017 and a Police Officer with the Pittsburgh Bureau of Police since that time. Officer Cochran has received training and education sponsored by the Pittsburgh Bureau of Police Academy and elective training through the Northeast Counterdrug Training Center, Professional Law Enforcement Training, Six Layer Concepts and Consulting and the Institute for Law Enforcement Education. Officer Cochran is certified in 28 CFR Part 23, the Bureau of Justice Assistance's Criminal Intelligence Systems Operating Policies. Officer Cochran's elective training has focused on law enforcement intelligence, interviewing and interrogation, undercover policing, proactive police work, social media networking, and narcotics enforcement. In this time Officer Cochran has been involved in numerous investigations including but not limited to: firearms violations, narcotics, robberies, aggravated assaults, non-fatal shootings, stolen vehicles, and carjackings. Officer Cochran has personally been involved in numerous arrests including physical arrests, probable cause searches, and the application and the execution of search and arrest warrants. Officer Cochran has assisted outside agencies, both Federal, local, and state agencies.

In your Affiant's training, knowledge and experience, your Affiant knows that the purchase of multiple firearms, sometimes on the same day, some of the same exact type, purchased in a short amount of time, is a strong indicator of straw purchasing, illegal transfer of firearms and criminal activity. Whenever handguns are sold or transferred as per Federal and Pennsylvania State laws a background check is required and this transaction must be conducted through a Federal Firearms Licensee (FFL). Whenever handgun purchases or transfers are completed through an FFL and the firearm is then transferred to someone else, (not utilizing a FFL or a background check) this is commonly referred to as a "Straw Purchase" meaning an intentional act to avoid a lawful purchase or transfer and a violation of Pennsylvania Crimes Code Section 6111 Sale or Transfer of Firearms.

On February 15, 2022, Officer C. Cochran (Pittsburgh Bureau of Police) contacted your affiant regarding possible straw purchases by Jalaan WILLIAMS. Officer Cochran informed me that multiple firearms purchased by WILLIAMS were recovered by law enforcement on Allen GLOVER Jr., a person prohibited from possessing a firearm pursuant to Pennsylvania and federal law. Officer Cochran believed WILLIAMS was straw purchasing firearms and illegally transferring them to GLOVER.

State and local databases confirmed that WILLIAMS has purchased the following firearms (Note that although Williams purchased eight firearms, she only completed seven 4473s as two firearms were purchased on the same day):

- Taurus G2C 9mm pistol (SER: TLR10664), DOS: 11/7/2018 (Allegheny County)



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAN	Middle:	Last: WILLIAMS

- Recovered from Allen Glover Jr.
- Taurus PT 140 .40 pistol (SER: SGZ55965). DOS: 11/7/2018. (Allegheny County)
- Unrecovered.
- SCCY CPX-1 9mm pistol (SER: 726683). DOS: 2/2/2019. (Allegheny County)
- Recovered from Allen Glover Jr.
- Draco 7.62 pistol (SER: PMD1094519). DOS: 3/29/2019. (Allegheny County)
- Unrecovered.
- Taurus 9mm pistol (SER: TLW88149). DOS: 8/24/2019. (Allegheny County)
- Recovered from Juvenile Male.
- Ruger EC9 9mm pistol (SER: 45721451). DOS: 6/1/2020. (Allegheny County)
- Recovered from Jalaan Williams.
- Smith & Wesson SW9VE (SER: DUV2322). DOS: 6/4/2020. (Allegheny County)
- Recovered from Allen Glover Jr.
- Ruger PC Charger 9mm pistol (SER: 91301150). DOS: 6/10/2020. (Allegheny County)
- Unrecovered.

Officer Cochran informed me of a Burglary report WILLIAMS had filed with Pittsburgh Police on April 20, 2019. WILLIAMS informed Officers that on or around April 18, 2019, her residence had been burglarized. During the burglary, WILLIAMS stated that a Taurus PT 140.40 pistol (SGZ55965) and a Taurus G2C 9mm pistol (SER: TLR10664) had been stolen from underneath her couch, along with a TV and Blu-Ray player.

Three days later, on April 23, 2019, Lincoln Borough Police arrested GLOVER and recovered the stolen Taurus G2C 9mm pistol (SER: TLR10664) inside GLOVER's vehicle.

On April 29, 2019, Pittsburgh Police Detectives followed up with WILLIAMS regarding the burglary, as the circumstances and gun recovery were suspicious. Williams stated that she did not want any further investigation into the incident and that her TV and Blu-Ray player had been returned to her by an individual known as Daonte "Daday" Miller. WILLIAMS then changed her story and said she left her Taurus G2C 9mm pistol (SER: TLR10664) inside the glove box of GLOVER's vehicle and that she misplaced the Taurus PT 140 .40 pistol (SER: SGZ55965).

On March 13, 2020, Officer Cochran arrested GLOVER for Violations of the Uniform Firearm Act- prohibited person after police recovered a SCCY CPX-1 9mm pistol (SER: 726683). As stated previously, due to GLOVER's criminal history, he is prohibited from possessing a firearm. This firearm was purchased by WILLIAMS, however, the firearm was never reported stolen.

On July 20, 2020, GLOVER was again arrested by Pittsburgh Police Officers Branden and Seaburn, after they recovered a Smith & Wesson SW9 9mm pistol (SER: DUV2322) from GLOVER. This firearm was purchased by WILLIAMS, however, the firearm was never reported stolen.

On Thursday, January 6, 2022, Munhall Police recovered another WILLIAMS' firearm. Detectives responded to a domestic dispute and observed, in plain view, a Taurus 9mm pistol (SER: TLW88149) lying on top of a portable closet in the bedroom of juvenile male 1 (JM1). JM1 was subsequently arrested but no information was gathered as to how he came to be in possession of the firearm.

As of February 15, 2022, when Officer Cochran referred this case to the OAG Gun Violence Section, four of WILLIAMS' firearms were recovered by law enforcement and one was reported stolen. Of the four firearms recovered by law enforcement, three were recovered on GLOVER who is prohibited from possessing a firearm and one was recovered from a juvenile, who is also



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAAAN	Middle:	Last: WILLIAMS

prohibited from possessing a firearm.

Suspecting that WILLIAMS was engaged in multiple straw purchases, Officer Cochran and I met with WILLIAMS at her residence on March 23, 2022. WILLIAMS invited us into her apartment and agreed to speak with us. It is noted that as I entered the apartment, I observed WILLIAMS carrying a firearm in her waistband. For our safety and hers, Officer Cochran removed the firearm from WILLIAMS and rendered it safe. The recovered firearm was identified as a Ruger EC9 9mm pistol (SER: 45721451).

As a result of this conversation, WILLIAMS consented to a recorded interview wherein she admitted to conducting multiple straw purchases, falsifying ATF Form 4473, and filing a false report to Pittsburgh Police. It is noted that WILLIAMS was provided with and signed a MIRANDA Waiver prior to this confession. WILLIAMS confessed to the following points:

- All firearms, except the Ruger EC9 9mm pistol (SER: 45721451) and the Taurus PT 140 .40 pistol (SER: SGZ55965), were purchased on behalf of Allen GLOVER.
- The Taurus PT 140 .40 pistol (SER: SGZ55965) was purchased on behalf of GLOVER's friend, who is currently unidentified. GLOVER's friend also picked out this firearm and provided WILLIAMS with \$650 for the purchase.
- Therefore, WILLIAMS falsified ATF Form 4473 (6) times. This form states: "Are you the actual transferee/buyer of the firearm(s) listed on this form? WARNING: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you." On these forms, WILLIAMS claimed that she was the actual buyer of these firearms.
- WILLIAMS stated that she was intimate partners with GLOVER for several years.
- WILLIAMS stated that, except for the Ruger EC9, GLOVER was with her during each firearm purchase and picked out each firearm himself.
- WILLIAMS stated that, except for the Ruger EC9, GLOVER provided her with cash for each firearm purchase.
- WILLIAMS stated that she was aware of GLOVER's criminal history and knew that he was prohibited from purchasing/possessing a firearm.
- WILLIAMS stated that (2) of these firearm purchases occurred at the Monroeville Gun Show and that GLOVER was with her for both gun show purchases.
- WILLIAMS stated that she is a user of marijuana. Therefore, WILLIAMS falsified ATF Form 4473 (7) times. This form states: "Are you an unlawful user of or addicted to marijuana, or any depressant, stimulant, narcotic drug, or any other controlled substances?" On this form, WILLIAMS claimed that she was not an unlawful user of marijuana.
- WILLIAMS stated that she falsified the burglary report that was filed to Pittsburgh Police on April 20, 2019.
- WILLIAMS stated that she is unaware of who is currently in possession of her Draco7.62 pistol (SER: PMD1094519) or Ruger PC Charger 9mm pistol (SER: 91301150). The only information WILLIAMS could provide was that GLOVER sold the Draco "to the Jamaicans" and that GLOVER sold the Ruger PC Charger to an unidentified individual.
- WILLIAMS stated that the last fight she had with GLOVER, which led to their breakup, occurred over GLOVER taking advantage of her to purchase firearms on his behalf.
- WILLIAMS does not possess a Federal Firearms License, therefore, she cannot lawfully transfer firearms.

Your Affiant reviewed GLOVER's criminal history and located the following convictions:

- April 16, 2004 FOUND GUILTY: 5104 RESISTING ARREST OR OTHER COUNTY LAW ENFORCEMENT M2 (OTN K069204-2).
- May 11, 2008 PLEAD GUILTY: 3922A1 THEFT BY DECEPTION1 M2 (OTN G431292-1).
- April 23, 2019 PLEAD GUILTY: 113A31 POSSESSION OF SMALL AMOUNTS OF MARIHUANA M, 753802D1 DRIVING UNDER THE INFLUENCE OF A CONTROLLED SUBSTANCE M (OTN G836082-2).
- July 20, 2020 PLEAD GUILTY: 113A16 POSSESSION OF A CONTROLLED SUBSTANCE M (OTN G869466-3).
- April 13, 2020 PLEAD GUILTY: 113A16 POSSESSION OF A CONTROLLED SUBSTANCE M (OTN G872263-0).

In addition, there is a final PFA (PFA-FD-16-004837-01) against GLOVER issued on July 6, 2021, which currently prohibits him



**POLICE CRIMINAL COMPLAINT**

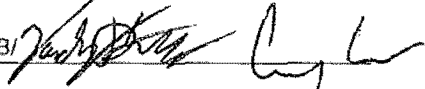
Docket Number:	Date Filed:	OTN/LiveScan Number G 909982-3	Complaint/Incident Number ASAP-670321/GVS220019
Defendant Name	First: JALAAN	Middle:	Last: WILLIAMS

from possessing any firearms.


Based on WILLIAMS' admission, it is clear that she knowingly and intentionally purchased seven firearms on behalf of GLOVER Jr, illegally transferred the firearms to his possession, and falsified multiple Federal and State documents while completing these transactions.

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

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

/ZACHARY WEBB/   
(Signature of Affiant)

Sworn to me and subscribed before me this 26 day of MAY, 2022

\_\_\_\_\_  
Date  Magisterial District Judge

My commission expires first Monday of January,

JEFFREY L. HERBST  
MAGISTERIAL DISTRICT JUDGE  
MAY 2-07  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY OF JANUARY, 2024



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

MDJ: Hon. JEFFREY L HERBST  
Magisterial District Number: 05-2-07  
Address: PARKWAY BUILDING, SUITE 1500  
339 OLD HAYMAKER ROAD  
MONROEVILLE, PA 15146  
Phone: 412.372.1125

DEFENDANT: (NAME and ADDRESS):  
CRAIG LAVELLE JOYNER  
First Name Middle Name Last Name Gen.  
950 WOODLOW STREET B3 108 PITTSBURGH, PA 15205

NCIC Extradition Code Type

Felony - Full Extradition  
Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>02900</i>	Date Filed <i>5-15-22</i>	OTN/LiveScan Number G 909964-6	Complaint/Incident Number ASAP-670503/22-1121	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 01/28/2001	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>
RACE WHITE	First Name	Middle Name	Last Name	Gen.
ETHNICITY	AKA			
HAIR COLOR BLN (BLONDE/STRAWBERRY)		EYE COLOR HAZ (HAZEL)		
DNA	DNA Location			WEIGHT (lbs.) 155
FBI Number	MNU Number		Ft HEIGHT In. 5 05	
Defendant Fingerprinted				
Fingerprint Classification				

DEFENDANT VEHICLE INFORMATION

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

Office of the attorney for the Commonwealth  Approved  Disapproved because: \_\_\_\_\_

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

name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, WILLIAM WHITE / JAMES DEWNE 27455 00498106  
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)  
of MONROEVILLE PA0021600  
(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 446 MONROEVILLE BORO  
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County 02 on or about 04/02/2022  
(County Code)

MAY 25 2022



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>2022-00</i>	Date Filed: <i>5-25-22</i>	OTN/LiveScan Number G 909964-6	Complaint/Incident Number ASAP-670503/22-1121
Defendant Name	First: CRAIG	Middle: LAVELLE	Last: JOYNER

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
<b>X</b>	1	6111	G4II	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 6111G4II Sale or Transfer of Firearms F3 1 COUNT									
The actor, a person, purchaser or transferee, in connection with the purchase, delivery or transfer of a firearm under Chapter 61, knowingly and intentionally made a materially false written statement including a statement on any form promulgated by Federal or State agencies, specifically On April 2, 2022, Craig Joyner knowingly made a materially false written statement on ATF Form 4473 by answering yes to question 21a, "Are you the actual transferee/ buyer of the firearm(s) listed on this form and any continuation sheet(s) ATF Form 5300.9a" while in the Monroeville Gun Show, when in fact he was not. The firearm was purchased on behalf of Devante Ferguson., in violation of 18 Pa.C.S. §6111(a)(11)									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
	2	FIREARM	C	of the	18	1	M2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 903A1 CRIMINAL CONSPIRACY M2 1 COUNT									
The actor, with the intent of promoting or facilitating the crime of 18:6111   SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS:C conspired and agreed with Devante Ferguson that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>2022-00</i>	Date Filed: <i>5-25-22</i>	OTN/LiveScan Number G 909964-6	Complaint/Incident Number ASAP-670503/22-1121
Defendant Name	First: CRAIG	Middle: LAVELLE	Last: JOYNER

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	4904	B	of the	18	1	M3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description/Acts of the accused associated with this Offense:

18 4904B UNSWORN FALSIFICATION TO AUTHORITIES M3 1 COUNT

The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made herein were punishable, in that the actor Craig Joyner, did, on or about April 2, 2022, make a written false statement which he did not believe to be true on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable. TO WIT: That the defendant, Craig Joyner, did, knowingly make a materially false written statement on ATF Form 4473 by answering "YES" to question 21.a., "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s) ATF Form 5300.9A" while in the Monroeville Gun Show, when in fact he was not. The firearm was purchased on behalf of Devante Ferguson., in violation of 18 Pa. C.S. §4904(b).









# POLICE CRIMINAL COMPLAINT

Docket Number: <i>U 212-20</i>	Date Filed: <i>5-25-22</i>	OTN/LiveScan Number G 909964-6	Complaint/Incident Number ASAP-670503/22-1121
Defendant Name	First: CRAIG	Middle: LAVELLE	Last: JOYNER

## AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:  
4/2/2022
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:  
4/2/2022

2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):  
Personal Observations of Det. White and Agent Devine, Statements of Craig Joyner and Devante Ferguson
- b) How the source of information knows this particular person committed the crime:  
Personal Observations of Det. White and Agent Devine, Statements of Craig Joyner and Devante Ferguson
- c) How both Affiant and/or source of information knows that a particular crime has been committed:  
Personal Observations of Det. White and Agent Devine, Statements of Craig Joyner and Devante Ferguson

3. WHAT CRIMES:

18 903 A1 CRIMINAL CONSPIRACY  
 18 6111 G4II Sale or Transfer of Firearms  
 18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES

4. WHERE CRIME(S) COMMITTED:

MONROEVILLE CONVENTION CENTER, 209 MALL BLVD, MONROEVILLE PA 15146

5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

- X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.  
 Source has given information in the past which has led to arrest and/or conviction  
 Defendant's reputation for criminal activity
- X This source made declaration against his/her penal interest to the above offense
- X Affiant and/or other Police Officers corroborated details of the information



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>12-242-22</i>	Date Filed: <i>5-25-22</i>	OTN/LiveScan Number G 909964-6	Complaint/Incident Number ASAP-670503/22-1121
Defendant Name	First: CRAIG	Middle: LAVELLE	Last: JOYNER

Your co-affiants are PA Office of Attorney General Gun Violence Section Agent, James Devine and Monroeville Borough Police Department Detective Matt White.

Your Affiant, Detective Matthew White of the Monroeville Police Department is a law enforcement officer of the Commonwealth of Pennsylvania within the meaning of section 5702, Title 18 Pa. C.S.A, and as such, Your Affiant is empowered to make arrests for the criminal offenses enumerated in Titles 18 and 35, PA C.S.A. Your Affiant has been a Monroeville Police Officer since June of 2013 and has been assigned to the Criminal Investigations Division since January 2017.

Prior to being a Monroeville Police Officer, Your Affiant was a duly sworn Pittsburgh Bureau of Police Officer from October 2000 until June 2013. Your Affiant was assigned to the Patrol Division of the Pittsburgh Bureau of Police from October 2000 until June 2013. From June of 2002 until December 2002, Your Affiant was assigned to the East End Rapist Task Force of the Pittsburgh Bureau of Police. In 2003, Your Affiant joined the Pittsburgh Police Rapid Emergency Deployment team, which was tasked with terrorism incidents, chemical bio warfare, and civil disturbance response. From 2004 to 2005, Your Affiant was assigned to the 3499 unit, which specializes in narcotics and firearms investigations and arrests along with specialized investigations. From 2005 to 2007, Your Affiant was assigned as a Field Training Officer, adjunct Pittsburgh Police Academy Instructor, and joined the Pittsburgh Police Bomb Squad in 2007.

During his employment as a Police Officer, your Affiant has been involved with hundreds of criminal investigations. Many of these investigations have resulted in the arrest and successful prosecution of individuals for violations of various criminal statutes.

James Devine is employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control as a Narcotics Agent and assigned to the Gun Violence Section in Erie, PA. He is also currently assigned to the Erie Law Enforcement Crime Task Force-Gun Working Group and is a full time Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives. As such, he is authorized to conduct investigations relative to Act 64, "The Controlled Substance, Drug, Device, and Cosmetic Act", and related offenses under Title 18. In the course of such investigations, he is authorized to apply for, obtain and serve search warrants, as well as make seizures and arrests. Agent Devine has been a narcotics agent for approximately twenty-three years. He successfully completed Act 120 training at the Indiana University of Pennsylvania in 1998. Additionally, he has received specialized training into violations of Act 64 and related offenses by the Pennsylvania Office of Attorney General, Pennsylvania State Police, Drug Enforcement Administration, Pennsylvania Narcotics Officers Association and the Northeast Counterdrug Training Center. This training included the methods utilized by drug dealers to traffic in various controlled substances. Agent Devine has conducted and/or participated in numerous investigations that have led to the arrest and prosecution of Act 64 violators and related offenses.

Your Affiants, being duly sworn according to law, depose and say:

Your affiants are familiar with the straw purchase of firearms. A straw purchase occurs when an individual purchases a firearm for someone who is unable to legally purchase a firearm themselves. A common indicator of a straw purchase is the prohibited individual providing the "straw man" with currency to complete the purchase. The currency is often provided to the "straw man" away from the FFL dealer in an attempt to disguise the straw purchase.

On April 2, 2022, your affiants were working in their official capacity at the Monroeville Gun Show, located within the Monroeville Convention Center, 209 Mall Boulevard, Monroeville, PA 15146. At approximately 2:35 PM, a member of the surveillance team indicated that an individual later determined to be Devante Ferguson, handed an unknown amount of currency to an individual later determined to be Craig Joyner. The two were then observed walking around to several FFL tables. Joyner ultimately purchased a Glock Model 36 semiautomatic pistol bearing the serial number BPCF908, from Highland Arms Company.



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>2022-20</i>	Date Filed: <i>5-25-22</i>	OTN/LiveScan Number G 909964-6	Complaint/Incident Number ASAP-670503/22-1121
Defendant Name	First: CRAIG	Middle: LAVELLE	Last: JOYNER

Ferguson stood by during the transaction. After exiting the show, affiant Devine observed Joyner attempt to hand Ferguson a white plastic bag that contained the Glock Model 36 pistol. Ferguson was observed tucking his hands close to his body and turning to the side to show that he did not want to take possession of the bag.


On April 22, 2022, your affiants interviewed Craig Joyner in a vehicle outside of his residence located at 950 Woodlow Street, Building 3, Apt.108, Pittsburgh, PA 15205. The interview was recorded with Joyner's permission. After being verbally Mirandized, Joyner indicated that after receiving currency from Ferguson, he purchased for him the aforementioned Glock 36 pistol. He continued by adding that he recommended the pistol for Ferguson and completed the transaction as Ferguson is not twenty-one years old and ineligible to purchase a pistol. Additionally, Joyner stated that he was not a Federal Firearms licensee and that he provided the Glock Model 36 to Ferguson after returning to their apartment building on the date of purchase. Joyner indicated that the pistol was currently in Ferguson's residence on the second floor of his apartment complex.

Then, your affiants interviewed Devante Ferguson at his apartment located at 950 Woodlow Street, Building 4, Apt. 204, Pittsburgh, PA 15205. Ferguson indicated that the Glock Model 36 pistol was "in the trash". He agreed to allow affiant Devine to retrieve it. Affiant Devine discovered the pistol in its original factory box in the trash can hidden under a bag of trash. Ferguson indicated that a loaded magazine for the pistol was located in his bedroom closet and then led affiant Devine to it. Ferguson then agreed to a recorded interview. After being verbally Mirandized, he indicated that he received the Glock Model 36 pistol from Joyner, after returning home from the Monroeville Gun Show on April 2, 2022. He indicated that he provided Joyner with the money to purchase the pistol as he was not yet eligible to do so because he was not yet twenty-one years of age.

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

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

/WILLIAM WHITE/   
(Signature of Affiant)

Sworn to me and subscribed before me this 25 day of MAY 2022  
Date , Magisterial District Judge

My commission expires first Monday of January,

**JEFFREY L. HERBST,**  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-07  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2024



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

MDJ: Hon. JEFFREY L HERBST  
Magisterial District Number: 05-2-07  
Address: PARKWAY BUILDING, SUITE 1500  
339 OLD HAYMAKER ROAD  
MONROEVILLE, PA 15146  
Phone: 412.372.1125

DEFENDANT: (NAME and ADDRESS):  
DEVANTE KHALIL FERGUSON  
First Name Middle Name Last Name Gen.  
950 WOODLOW STREET B4 204 PITTSBURGH, PA 15205

NCIC Extradition Code Type

Felony - Full Extradition  
Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR 241-22</i>	Date Filed <i>5-28-22</i>	OTN/LiveScan Number G 909961-3	Complaint/Incident Number ASAP-670506/22-1121	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 04/05/2003	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>
RACE BLACK	First Name	Middle Name	Last Name	Gen.
ETHNICITY	AKA			
HAIR COLOR BLK (BLACK)	EYE COLOR BRO (BROWN)			
DNA	DNA Location	WEIGHT (lbs.)		160
FBI Number	MNU Number	Ft. HEIGHT		5 09
Defendant Fingerprinted				
Fingerprint Classification				

DEFENDANT VEHICLE INFORMATION

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

Office of the attorney for the Commonwealth  Approved  Disapproved because: \_\_\_\_\_

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

name of the attorney for the Commonwealth (Signature of the attorney for the Commonwealth) (Date)

I, WILLIAM WHITE / *JAMES DEUWE* 27455 *COU 9810C*  
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of MONROEVILLE PA0021600  
(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 \_\_\_\_\_  
446 MONROEVILLE BORO  
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County 02 on or about 04/02/2022 15:45  
(County Code)



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CL 2021-00</i>	Date Filed: <i>5-25-22</i>	OTN/LiveScan Number G 909961-3	Complaint/Incident Number ASAP-670506/22-1121
Defendant Name	First: DEVANTE	Middle: KHALIL	Last: FERGUSON

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
<b>X</b>	1	FIREARM:	C	of the	18	1	M2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				
Statute Description/Acts of the accused associated with this Offense:									
18 903A1 CRIMINAL CONSPIRACY M2 1 COUNT									
The actor, with the intent of promoting or facilitating the crime of 18:6111   SALE OR TRANSFER OF FIREARMS - DUTY OF OTHER PERSONS:C conspired and agreed with Craig Joyner that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									





# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR01-22</i>	Date Filed: <i>5-25-22</i>	OTN/LiveScan Number G 909961-3	Complaint/Incident Number ASAP-670506/22-1121
Defendant Name	First: DEVANTE	Middle: KHALIL	Last: FERGUSON

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

*[Handwritten Signature]*  
*[Handwritten Signature]*

05/25/2022

/WILLIAM WHITE/ *J. DEANE*  
 (Signature of Affiant)

AND NOW, on this date 5/25/22 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.

*05-2-07*  
 (Magisterial District Court Number)

*[Handwritten Signature]*  
 (Issuing Authority)

JEFFREY L. HERBST,  
 MAGISTERIAL DISTRICT JUDGE  
 MAGISTERIAL DISTRICT 05-2-07  
 MY COMMISSION EXPIRES ON THE  
 FIRST MONDAY IN JANUARY, 2024



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 241-20</i>	Date Filed: <i>5-25-22</i>	OTN/LiveScan Number G 909961-3	Complaint/Incident Number ASAP-670506/22-1121
Defendant Name	First: DEVANTE	Middle: KHALIL	Last: FERGUSON

## AFFIDAVIT of PROBABLE CAUSE

1. **WHEN:**

a) Date when Affiant received information:

4/2/2022

b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:

4/2/2022

2. **HOW:**

a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):

Personal Observations of Det. White and Agent Devine, Statements of Devante Ferguson

b) How the source of information knows this particular person committed the crime:

Personal Observations of Det. White and Agent Devine, Statements of Devante Ferguson

c) How both Affiant and/or source of information knows that a particular crime has been committed:

Personal Observations of Det. White and Agent Devine, Statements of Devante Ferguson

3. **WHAT CRIMES:**

18 903 A1 CRIMINAL CONSPIRACY

4. **WHERE CRIME(S) COMMITTED:**

MONROEVILLE CONVENTION CENTER, 209 MALL BLVD, MONROEVILLE PA 15146

5. **WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:**

Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.

Source has given information in the past which has led to arrest and/or conviction

Defendant's reputation for criminal activity

This source made declaration against his/her penal interest to the above offense

Affiant and/or other Police Officers corroborated details of the information



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>R 241-22</i>	Date Filed: <i>5/25/22</i>	OTN/LiveScan Number G 909961-3	Complaint/Incident Number ASAP-670506/22-1121
Defendant Name	First: DEVANTE	Middle: KHALIL	Last: FERGUSON

Your co-affiants are PA Office of Attorney General Gun Violence Section Agent, James Devine and Monroeville Borough Police Department Detective Matt White.

Your Affiant, Detective Matthew White of the Monroeville Police Department is a law enforcement officer of the Commonwealth of Pennsylvania within the meaning of section 5702, Title 18 Pa. C.S.A, and as such, Your Affiant is empowered to make arrests for the criminal offenses enumerated in Titles 18 and 35, PA C.S.A. Your Affiant has been a Monroeville Police Officer since June of 2013 and has been assigned to the Criminal Investigations Division since January 2017.

Prior to being a Monroeville Police Officer, Your Affiant was a duly sworn Pittsburgh Bureau of Police Officer from October 2000 until June 2013. Your Affiant was assigned to the Patrol Division of the Pittsburgh Bureau of Police from October 2000 until June 2013. From June of 2002 until December 2002, Your Affiant was assigned to the East End Rapist Task Force of the Pittsburgh Bureau of Police. In 2003, Your Affiant joined the Pittsburgh Police Rapid Emergency Deployment team, which was tasked with terrorism incidents, chemical bio warfare, and civil disturbance response. From 2004 to 2005, Your Affiant was assigned to the 3499 unit, which specializes in narcotics and firearms investigations and arrests along with specialized investigations. From 2005 to 2007, Your Affiant was assigned as a Field Training Officer, adjunct Pittsburgh Police Academy Instructor, and joined the Pittsburgh Police Bomb Squad in 2007.

During his employment as a Police Officer, your Affiant has been involved with hundreds of criminal investigations. Many of these investigations have resulted in the arrest and successful prosecution of individuals for violations of various criminal statutes.

James Devine is employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control as a Narcotics Agent and assigned to the Gun Violence Section in Erie, PA. He is also currently assigned to the Erie Law Enforcement Crime Task Force-Gun Working Group and is a full time Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives. As such, he is authorized to conduct investigations relative to Act 64, "The Controlled Substance, Drug, Device, and Cosmetic Act", and related offenses under Title 18. In the course of such investigations, he is authorized to apply for, obtain and serve search warrants, as well as make seizures and arrests. Agent Devine has been a narcotics agent for approximately twenty-three years. He successfully completed Act 120 training at the Indiana University of Pennsylvania in 1998. Additionally, he has received specialized training into violations of Act 64 and related offenses by the Pennsylvania Office of Attorney General, Pennsylvania State Police, Drug Enforcement Administration, Pennsylvania Narcotics Officers Association and the Northeast Counterdrug Training Center. This training included the methods utilized by drug dealers to traffic in various controlled substances. Agent Devine has conducted and/or participated in numerous investigations that have led to the arrest and prosecution of Act 64 violators and related offenses.

Your affiants are familiar with the straw purchase of firearms. A straw purchase occurs when an individual purchases a firearm for someone who is unable to legally purchase a firearm themselves. A common indicator of a straw purchase is the prohibited individual providing the "straw man" with currency to complete the purchase. The currency is often provided to the "straw man" away from the FFL dealer in an attempt to disguise the straw purchase.

On April 2, 2022, your affiants were working in their official capacity at the Monroeville Gun Show, located within the Monroeville Convention Center, 209 Mall Boulevard, Monroeville, PA 15146. At approximately 2:35 PM, a member of the surveillance team indicated that an individual later determined to be Devante Ferguson, handed an unknown amount of currency to an individual later determined to be Craig Joyner. The two were then observed walking around to several FFL tables. Joyner ultimately purchased a Glock Model 36 semiautomatic pistol bearing the serial number BPCF908, from Highland Arms Company. Ferguson stood by during the transaction. After exiting the show, affiant Devine observed Joyner attempt to hand Ferguson a white plastic bag that contained the Glock Model 36 pistol. Ferguson was observed tucking his hands close to his body and turning to the side to show that he did not want to take possession of the bag.





# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 241-22</i>	Date Filed: <i>5-25-22</i>	OTN/LiveScan Number G 909961-3	Complaint/Incident Number ASAP-670506/22-1121
Defendant Name	First: DEVANTE	Middle: KHALIL	Last: FERGUSON

Then, on April 22, 2022, your affiants interviewed Devante Ferguson at his apartment located at 950 Woodlow Street, Building 4, Apt. 204, Pittsburgh, PA 15205. Ferguson indicated that the Glock Model 36 pistol was "in the trash". He agreed to allow affiant Devine to retrieve it. Affiant Devine discovered the pistol in its original factory box in the trash can hidden under a bag of trash. Ferguson indicated that a loaded magazine for the pistol was located in his bedroom closet and then led affiant Devine to it. Ferguson then agreed to a recorded interview. After being verbally Mirandized, he indicated that he received the Glock Model 36 pistol from Joyner, after returning home from the Monroeville Gun Show on April 2, 2022. He indicated that he provided Joyner with the money to purchase the pistol as he was not yet eligible to do so because he was not yet twenty-one years of age.

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

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

WILLIAM WHITE/

(Signature of Affiant)

Sworn to me and subscribed before me this 25 day of May, 2022

Date

Magisterial District Judge

My commission expires first Monday of January,

JEFFREY L. HERBST,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-07  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2024

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

MDJ: PITTSBURGH MUNICIPAL COURT  
Magisterial District Number: 05-0-03  
Address: 660 FIRST AVENUE  
PITTSBURGH, PA 15219

DEFENDANT:  
AUDRA

(NAME and ADDRESS):  
VOYE

First Name Middle Name Last Name Gen.  
4004 GRIZELLA ST. PITTSBURGH, PA 15212

Phone: 412.350.6715

NCIC Extradition Code Type

Felony - Extradition Surrounding States Only  
Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number 2550-1001	Date Filed 5-20-22	OTN/LiveScan Number G 909980-1	Complaint/Incident Number ASAP-670318/GVS220044	Request Lab Services? <input type="checkbox"/> Yes
GENDER FEMALE	DOB 09/30/1986	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>
RACE WHITE	First Name	Middle Name	Last Name	Gen.
ETHNICITY	AKA			
HAIR COLOR BRO (BROWN)	EYE COLOR BRO (BROWN)			
DNA	DNA Location		WEIGHT (lbs.) 220	
FBI Number	MNU Number		FT HEIGHT /In. 5 01	
Defendant Fingerprinted				
Fingerprint Classification				

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat	Registration Sticker (MMYY)	Comm'l Veh. Ind.	School Veh.	Other NCIC Veh. Code	Reg. Same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth  Approved  Disapproved because: \_\_\_\_\_

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

name of the attorney for the Commonwealth (Signature of the attorney for the Commonwealth) (Date)

I, ZACHARY WEBB / Corey Cochran 44947 / 301853  
(Name of the Affiant) (PSP/MP/PO/ETC - Assigned Affiant ID Number & Badge #)

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 301 PITTSBURGH CITY  
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County 02 on or about 10/30/2020 12:00  
(County Code)



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909980-1	Complaint/Incident Number ASAP-670316AGVS220044
Defendant Name	First AUDRA	Middle:	Last: VOYE

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

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
X	1	4911	A1	of the	18	5	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 4911A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION F3 5 COUNTS									
The actor knowingly made a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, namely ATF Form 4473, with the intent to defraud or injure another, in violation of 18 Pa. C.S. §4911(a)(1) and (b).									
The actor knowingly made a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, namely ATF Form 4473, with the intent to defraud or injure another, in violation of 18 Pa. C.S. §4911(a)(1) and (b).									
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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909980-1	Complaint/Incident Number ASAP-670316/GVS220044
Defendant Name	First: AUDRA	Middle:	Last: VOYE

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	2	6111	G4II	of the	18	5	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (If applicable)	Accident Number					<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description/Acts of the accused associated with this Offense:									
<p><b>18 6111G4II Sale or Transfer of Firearms F3 5 COUNTS</b></p> <p>The actor, a person, purchaser or transferee, in connection with the purchase, delivery or transfer of a firearm under Chapter 61, knowingly and intentionally made a materially false written statement including a statement on any form promulgated by Federal or State agencies, specifically falsified ATF form 4473 question 21.e., in violation of 18 Pa.C.S. §6111(a)(11)</p> <p>The actor, a person, purchaser or transferee, in connection with the purchase, delivery or transfer of a firearm under Chapter 61, knowingly and intentionally made a materially false written statement including a statement on any form promulgated by Federal or State agencies, specifically falsified ATF form 4473 question 21.e., in violation of 18 Pa.C.S. §6111(a)(11)</p> <p>The actor, a person, purchaser or transferee, in connection with the purchase, delivery or transfer of a firearm under Chapter 61, knowingly and intentionally made a materially false written statement including a statement on any form promulgated by Federal or State agencies, specifically falsified ATF form 4473 question 21.e., in violation of 18 Pa.C.S. §6111(a)(11)</p> <p>The actor, a person, purchaser or transferee, in connection with the purchase, delivery or transfer of a firearm under Chapter 61, knowingly and intentionally made a materially false written statement including a statement on any form promulgated by Federal or State agencies, specifically falsified ATF form 4473 question 21.e., in violation of 18 Pa.C.S. §6111(a)(11)</p> <p>The actor, a person, purchaser or transferee, in connection with the purchase, delivery or transfer of a firearm under Chapter 61, knowingly and intentionally made a materially false written statement including a statement on any form promulgated by Federal or State agencies, specifically falsified ATF form 4473 question 21.e., in violation of 18 Pa.C.S. §6111(a)(11)</p>									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	4906	B1	of the	18	1	M2	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (If applicable)	Accident Number					<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description/Acts of the accused associated with this Offense:									
<p><b>18 4906B1 FALSE REPORTS TO LAW ENFORCEMENT AUTH - Fictitious Reports M2 1 COUNT</b></p> <p>The actor reported to law enforcement authorities an offense or other incident within their concern knowing that it did not occur, namely filed a false burglary report in order to claim that her firearms were stolen, as to a false report of the theft or loss of the firearm, as defined in section 5515, in violation of 18 Pa. C.S. §4906(b)(1) and (c)(2).</p>									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909980-1	Complaint/Incident Number ASAP-670316JGVVS220044
Defendant Name	First: AUDRA	Middle:	Last: VOYE

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	4	4904	B	of the	18	5	M3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description/Acts of the accused associated with this Offense:									
<p>18 4904B UNSWORN FALSIFICATION TO AUTHORITIES M3 5 COUNTS</p> <p>The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor falsified ATF form 4473 question 21.e., in violation of 18 Pa. C.S. §4904(b).</p> <p>The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor falsified ATF form 4473 question 21.e., in violation of 18 Pa. C.S. §4904(b).</p> <p>The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor falsified ATF form 4473 question 21.e., in violation of 18 Pa. C.S. §4904(b).</p> <p>The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor falsified ATF form 4473 question 21.e., in violation of 18 Pa. C.S. §4904(b).</p> <p>The actor made a written false statement which the actor did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the affect that false statements madetherein were punishable, in that the actor falsified ATF form 4473 question 21.e., in violation of 18 Pa. C.S. §4904(b).</p>									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909980-1	Complain/Incident Number ASAP-670316/GVS220044
Defendant Name	First: AUDRA	Middle:	Last: VOYE

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

\_\_\_\_\_ /05/25/2022/ \_\_\_\_\_ /ZACHARY WEBB/ *Zachary Webb*  
 (Date) (Signature of Affiant)  
 AND NOW, on this date 5/26/22 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.

05-0-03 \_\_\_\_\_ *Oscar Peltos*  
 (Magisterial District Court Number) (Issuing Authority)







**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed:	OTN/LiveScan Number G 909980-1	Complaint/Incident Number ASAP-670316/GVS220044
Defendant Name	First AUDRA	Middle:	Last: VOYE

**AFFIDAVIT of PROBABLE CAUSE**

1. **WHEN:**

a) Date when Affiant received information:

4/21/2022

b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:

9/29/2021

2. **HOW:**

a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):

Defendant's admissions

b) How the source of information knows this particular person committed the crime:

Defendant's admissions

c) How both Affiant and/or source of information knows that a particular crime has been committed:

Defendant's admissions

3. **WHAT CRIMES:**

- 18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES
- 18 6111 G4II Sale or Transfer of Firearms
- 18 6111 G4II Sale or Transfer of Firearms
- 18 6111 G4II Sale or Transfer of Firearms
- 18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION
- 18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION
- 18 4906 B1 FALSE REPORTS TO LAW ENFORCEMENT AUTH - Fictitious Reports
- 18 6111 G4II Sale or Transfer of Firearms
- 18 6111 G4II Sale or Transfer of Firearms
- 18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION
- 18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION
- 18 4911 A1 TAMPERING WITH PUBLIC RECORDS OR INFORMATION
- 18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES
- 18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES
- 18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES
- 18 4904 B UNSWORN FALSIFICATION TO AUTHORITIES

4. **WHERE CRIME(S) COMMITTED:**

ALLEGHENY COUNTY, PA



# POLICE CRIMINAL COMPLAINT

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Defendant Name	First AUDRA	Middle:	Last VOYE

6. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

- X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.  
Source has given information in the past which has led to arrest and/or conviction  
Defendant's reputation for criminal activity  
This source made declaration against his/her penal interest to the above offense
- X Affiant and/or other Police Officers corroborated details of the information





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 909980-1	Complaint/Incident Number ASAP-670316/GVS220044
Defendant Name	First: AUDRA	Middle:	Last: VOYE

Your Affiant, Agent Zachary Webb (NA Webb), being duly sworn, deposes and says, I am a Narcotics Agent employed by the Office of Attorney General, Bureau of Narcotics Investigation and Drug Control (OAG-BNI) assigned to the Gun Violence Section (GVS). As such, I am tasked with investigating violations of the Pennsylvania Crimes Code including Violations of the Uniform Firearms Act (18 PA.C.S.A. §6105, §6106), illegal firearm transfers straw purchases (18 PA.C.S.A. §6111), and violations of the Controlled Substance, Drug Device and Cosmetic Act of April 1972, P.L. 233, No. 64, 35 P.S. §780-101 et seq., Corrupt Organizations (18 PA.C.S.A. §911) and charges recommended by a statewide investigating grand jury. Your Affiant completed the Class "A" Pennsylvania State Police Wiretapping and Electronic Surveillance Training School as mandated in Section 5742 of Act 18, Pa.C.S.A., 5701 et seq.

Prior to this position, your Affiant was employed by the Pittsburgh Bureau of Police from March, 2016 through October, 2021. Your Affiant completed Act 120 Training through the City of Pittsburgh. During this time, your Affiant has made hundreds of arrests, which included Violations of the Uniformed Firearms Act, and authored and executed multiple search warrants for vehicles, cell phones, and residences. Your Affiant has received specialized training in interviewing/interrogation, search and seizure, and was certified as a Training Instructor.

Your co-affiant, Officer Corey Cochran, MPOETC No. 301853, is a law enforcement officer of the Commonwealth of Pennsylvania within the meaning of Section 5702 of the Pennsylvania Crimes Code and, as such, are empowered to make arrests for criminal offenses enumerated therein. All of the information contained in this affidavit was learned directly by your affiant, or was communicated to them by other law enforcement officers. Officer Cochran has been a police officer with the Commonwealth of Pennsylvania since 2017 and a Police Officer with the Pittsburgh Bureau of Police since that time. Officer Cochran has received training and education sponsored by the Pittsburgh Bureau of Police Academy and elective training through the Northeast Counterdrug Training Center, Professional Law Enforcement Training, Six Layer Concepts and Consulting and the Institute for Law Enforcement Education. Officer Cochran is certified in 28 CFR Part 23, the Bureau of Justice Assistance's Criminal Intelligence Systems Operating Policies. Officer Cochran's elective training has focused on law enforcement intelligence, interviewing and interrogation, undercover policing, proactive police work, social media networking, and narcotics enforcement. In this time Officer Cochran has been involved in numerous investigations including but not limited to: firearms violations, narcotics, robberies, aggravated assaults, non-fatal shootings, stolen vehicles, and carjackings. Officer Cochran has personally been involved in numerous arrests including physical arrests, probable cause searches, and the application and the execution of search and arrest warrants. Officer Cochran has assisted outside agencies, both Federal, local, and state agencies.

In your Affiant's training, knowledge and experience, your Affiant knows that the purchase of multiple firearms, sometimes on the same day, some of the same exact type, purchased in a short amount of time, is a strong indicator of straw purchasing, illegal transfer of firearms and criminal activity. Whenever handguns are sold or transferred as per Federal and Pennsylvania State laws a background check is required and this transaction must be conducted through a Federal Firearms Licensee (FFL). Whenever handgun purchases or transfers are completed through an FFL and the firearm is then transferred to someone else, (not utilizing a FFL or a background check) this is commonly referred to as a "Straw Purchase" meaning an intentional act to avoid a lawful purchase or transfer and a violation of Pennsylvania Crimes Code Section 6111 Sale or Transfer of Firearms.

On Thursday, April 21, 2022, your Affiant met with Pittsburgh Bureau of Police Detective Swimkosky, of the Burglary Unit. Det. Swimkosky informed me of his current investigation into a burglary reported by Audra VOYE.

On September 29, 2021, VOYE alleges that three of her firearms were stolen from her residence. These firearms are described as: Glock 30 .45 pistol (SER: BRGY565), Glock 27 .40 pistol (SER: RFY444), and a Glock 19 9mm pistol (SER: BAZK668). VOYE stated that she kept all three firearms in her bedroom closet and when she went to retrieve them to go to the range she discovered that all three firearm boxes were empty. VOYE stated that she does not have a safe nor locks on the boxes. VOYE stated that she also lost the paperwork for all three firearms. There was no forced entry observed by the responding Officer.



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State and local databases confirmed that VOYE has purchased the following firearms in Allegheny County:

- Glock 30 (SER: BRGY665)-Purchased on 10/30/2020
- SCCY CPX-2 (SER: 762612)-Purchased on 11/5/2020
- Glock 19 (SER: BAZK668)-Purchased on 2/23/2021
- Recovered from Devon FLANIGAN.
- Glock 27 (SER: RFY444)-Purchased on 4/23/2021
- Recovered from Daniel MOWRY.
- Sig Sauer P365 (SER: NRA021505)-Purchased on 4/25/2022
- Recovered from Audra VOYE.

In regards to the Glock 19 9mm pistol (SER: BAZK668), the firearm had been previously recovered on August 5, 2021 by Allegheny County Police. This firearm was found in possession of Devon FLANIGAN, who is prohibited from possessing a firearm.

In regards to the Glock 27 .40 pistol (SER: RFY444), the firearm was recovered on September 28, 2021 by Pittsburgh Police. The firearm was found to be in the possession of Daniel MOWRY, who is prohibited from possessing the firearm. It is noted that this firearm was recovered one day before VOYE filed the burglary report.

In regards to the Glock 30 .45 pistol (SER: BRGY665) and the SCCY CPX-2 9mm pistol (SER: 762612), these firearms have not yet been recovered. It is noted that the SCCY CPX-2 9mm pistol (SER: 762612) was never reported stolen.

Det. Swimkosky provided your Affiant with a recorded interview he conducted with VOYE on December 16, 2021. During the interview, VOYE is shown a picture of Daniel MOWRY, who was found to be in of her Glock 27 .40 pistol (SER: RFY444). VOYE stated that she does know MOWRY and that he was from her neighborhood. VOYE stated that she was previously dating MOWRY's neighbor, who has been identified as Shawn GREEN. VOYE stated that MOWRY has been in her house with GREEN on multiple occasions. VOYE stated that it was possible that either MOWRY or GREEN could have taken the firearms.

In addition, Det. Swimkosky provided your Affiant with a series of ACJ text messages between VOYE and inmate, Shawn GREENE. On September 29, 2021, VOYE informs GREEN that she just had to report her firearms stolen. GREEN responds, "lol" and "why u keep textn me sayn dumb shit."

During the interview, Det. Swimkosky asked VOYE if she told anyone that her guns had been stolen. VOYE stated that she did not tell anyone about reporting her firearms stolen. However, this directly contradicts the jail text messages between VOYE and GREEN.

On May 4, 2022, with the assistance of Narcotics Agent Sinisi, your Affiant met with VOYE at her residence located at 4004 Grizella St. Apt. 2 Pittsburgh, PA. During the course of this conversation, Agents learned that VOYE falsified her burglary report to Pittsburgh Police and that she falsified ATF form 4473 five times.

Your Affiant provided VOYE with a MIRANDA Waiver which she read, signed, and dated. VOYE then consented to a recorded interview in which she stated the following:

- VOYE acknowledged that Agents were speaking to her in regards to the five firearms she has purchased.
- VOYE acknowledged that she was currently in possession of her Sig Sauer P365 9mm pistol (SER: NRA021505) which Agents located in VOYE's bedroom.
- When asked about the burglary report she filed on September 29, 2021, regarding three of her firearms (Glock 30, Glock 27, and a Glock 19) that were stolen, VOYE stated the she did falsify information on the burglary report.



**POLICE CRIMINAL COMPLAINT**

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- VOYE identified the actor who stole her firearms as Devon FLANIGAN.
- VOYE stated that her family and FLANIGAN's family are very close and that she and FLANIGAN have known each other for years.
- However, VOYE stated that she had several issues with FLANIGAN stealing from her.
- When asked how VOYE knew FLANIGAN stole her firearms, VOYE stated, "he basically told me" and that she saw FLANIGAN carrying one of her firearms on his waist.
- VOYE stated that she does not know when FLANIGAN took her three firearms. VOYE stated that FLANIGAN did not take all three firearms on the same day.
- VOYE stated that she does not remember the exact date she first observed FLANIGAN with one of her firearms, however, after observing FLANIGAN with her firearm she checked her closet and observed that the other two firearms were still in the closet.
- VOYE stated the first time she saw FLANIGAN with her gun was early summer but could not provide any better date.
- VOYE stated that about two months after this incident with FLANIGAN she observed that the other two firearms were missing.
- VOYE stated that two months after realizing the other two firearms were missing she file the burglary report with Pittsburgh Police.
- VOYE did not provide a reason why she waited two months to report her firearms missing.
- It is noted that in the burglary report, VOYE stated she discovered all three of her firearms missing on September 29, 2021. In addition, VOYE reported that she had not seen her firearms for four to five months.
- In regards to VOYE's SCCY CPX-2 9mm pistol (SER: 762612), VOYE stated that she was in possession of this firearm until approximately October, 2021.
- VOYE stated that she has no idea what happened to this firearm, who may have taken it, or when it might have gone missing.
- The only information VOYE could provide was that she believes the SCCY was taken from her previous residence at 1221 Courtright St.
- VOYE stated that she had several younger people from the neighborhood in and out of her residence and that they would come over and "eat and smoke their weed". VOYE frequently referred to herself as the "neighborhood mom."
- VOYE confirmed that she is an unlawful user of marijuana. VOYE stated that she has been smoking since she was 18 years old. VOYE does not have a medical marijuana card.
- I provided VOYE with copies of her 4473 from when she purchased her firearms. I directed VOYE to question 21e, which stated: "Are you an unlawful user of or addicted to marijuana, or any depressant, stimulant, narcotic drug, or any other controlled substances?" VOYE confirmed that she answered "No" to this question on each of her five 4473 forms although she knew that she was an unlawful user of marijuana.

Based on this conversation, your Affiant confirmed that VOYE falsified ATF form 4473 by intentionally lying about her marijuana use and confirmed that VOYE falsified the burglary report she filed to Pittsburgh Police. Your Affiant confirmed that VOYE knew her firearms were missing two months prior to September 29, 2021, yet she reported that she first realized they were missing on this date. VOYE stated that she had not seen her firearms for four to five months prior to filing the burglary report. Your Affiant confirmed this information was falsified based on her recorded statements. VOYE stated in the burglary report that she did not know of anyone that would steal the firearms. Your Affiant confirmed VOYE falsified this information as she confirmed Devon FLANIGAN was the actor who allegedly stole the firearms.

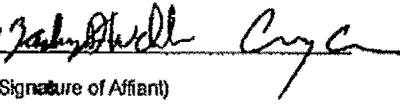


# POLICE CRIMINAL COMPLAINT

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Defendant Name	First AUDRA	Middle:	Last VOYE

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

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

ZACHARY WEBB   
(Signature of Affiant)

Sworn to me and subscribed before me this 26<sup>th</sup> day of May, 2022  
5/26/22 Date Oscar J. Pletzer, Magisterial District Judge

My commission expires first Monday of January, 2026

