

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

Phone: 412.350.6715

DEFENDANT:

(NAME and ADDRESS):

WILLIAM KENETH ELY
First Name Middle Name Last Name Gen.

1932 WRIGHT STREET WILKINSBURG, PA 15221

NCIC Extradition Code Type

Felony - Limited Extradition
Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CR-4163-2022 Date Filed: 8-15-2022 OTN/LiveScan Number: G 914414-4 Complaint/Incident Number: ASAP-684702/BN5210105H Request Lab Services? Yes

GENDER: MALE DOB: 01/20/1981 POB: Add'l DOB: Co-Defendant(s)

RACE: BLACK First Name: Middle Name: Last Name: Gen.

ETHNICITY: AKA:

HAIR COLOR: XXX (UNK./BALD) EYE COLOR: BRO (BROWN)

DNA: DNA Location: WEIGHT (lbs.): 250

FBI Number: MNU Number: Ft. HEIGHT in: 5 11

Defendant Fingerprinted: 5 11

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:

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, CHRISTOPHER MINTON 35868
(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 301 PITTSBURGH CITY
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County 02 on or about 06/01/2021 0:00
(County Code)



POLICE CRIMINAL COMPLAINT

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Defendant Name	First: WILLIAM	Middle: KENETH	Last: ELY

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	6105	A1	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 6105A1 PERSONS NOT TO POSSESS, USE, MANUFACTURE, CONTROL, SELL OR TRANSFER FIREARMS F1 1 COUNT									
The actor, who was previously convicted of a felony enumerated under subsection 6105(b) or a felony under The Controlled Substance, Drug, Device and Cosmetic Act, or any equivalent Federal statute or equivalent statute of any other state, possessed, used, controlled, sold, transferred, manufactured or obtained a license to possess, use, control, sell, transfer or manufacture a firearm, and the person had previously been convicted of an offense under subsection 6105(a), in violation of 18 Pa. C.S. §6105 (a) and (a.1)(1.1).									

<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						
	2	911	B3	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 911B3 CORRUPT ORGANIZATION F1 1 COUNT									
The actor, employed by or associated with an enterprise, conducted or participated, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, namely, Act 64 in violation of 18 Pa. C.S. §911(b)(3).									



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	911	B4	of the	18	1	F1	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 911B4 CORRUPT ORGANIZATION F1 1 COUNT The actor conspired with Jaylon Brock, Tony Burnsworth to violate any of the provisions of subsections (1),(2) or (3) of Section 911(b) of the Pennsylvania Crimes Code, in violation of 18 Pa. C.S. §911(b)(4).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	4	6105	A1	of the	18	1	F2	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 6105A1 PERSONS NOT TO POSSESS, USE, MANUFACTURE, CONTROL, SELL OR TRANSFER FIREARMS F2 1 COUNT The actor, who was previously convicted of an offense enumerated in subsection (b), namely 04/29/2015 within or without this Commonwealth, regardless of the length of sentence, possessed, used, controlled, sold, transferred, manufactured or obtained a license to possess, use, control, sell, transfer or manufacture a firearm, in violation of 18 Pa. C.S. §6105 (a).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	5	7512	A	of the	18	1	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 7512A CRIMINAL USE OF COMMUNICATION FACILITY F3 1 COUNT The actor used a communication facility to commit, cause, or facilitate the commission or the attempted commission of a crime constituting a felony under Title 18 of the Pennsylvania Crimes Code, or a felony under the Controlled Substance Drug Device and Cosmetic Act namely, Cellular devise to organized drug transactions, in violation of 18 Pa.C.S.§ 7512.									



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	6	780-113	A30	of the	35	2	F	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:									
35 780-113A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV F 2 COUNTS									
The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, possessed with intent to deliver a controlled substance, namely, Fentanyl, in violation of 35 P.S. §780-113(a) (30).									
The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, possessed with intent to deliver a controlled substance, namely, Cocaine, in violation of 35 P.S. §780-113(a) (30).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	7	780-113	A16	of the	35	2	M	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:									
35 780-113A16 PROHIBITED ACTS - POSSESSION M 2 COUNTS									
The actor knowingly or intentionally possessed a controlled or counterfeit substance, namely, Fentanyl the said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board, in violation of 35 P.S. §780-113(a)(16).									
The actor knowingly or intentionally possessed a controlled or counterfeit substance, namely, Cocaine the said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board, in violation of 35 P.S. §780-113(a)(16).									



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<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	8	780-113	A32	of the	35	1	M		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				
Statute Description/Acts of the accused associated with this Offense:									
<p>35 780-113A32 PROHIBITED ACTS M 1 COUNT</p> <p>The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, used or possessed with intent to use drug paraphernalia for the purpose of planting, propagating, cultivating, growing, harvesting, manufacturing, compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, injecting, ingesting, inhaling or otherwise introducing into the human body, a controlled substance, in violation of 35 P.S. §780-113(a) (32).</p>									



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AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:
6/1/2021
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:
6/1/2021

2. HOW:

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

3. WHAT CRIMES:

18 7512 A CRIMINAL USE OF COMMUNICATION FACILITY
 18 911 B3 CORRUPT ORGANIZATION
 35 780-113 A16 PROHIBITED ACTS - POSSESSION
 35 780-113 A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV
 18 6105 A1 PERSONS NOT TO POSSESS, USE, MANUFACTURE, CONTROL, SELL OR TRANSFER FIREARMS
 18 6105 A1 PERSONS NOT TO POSSESS, USE, MANUFACTURE, CONTROL, SELL OR TRANSFER FIREARMS
 35 780-113 A32 PROHIBITED ACTS
 35 780-113 A16 PROHIBITED ACTS - POSSESSION
 35 780-113 A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV
 18 911 B4 CORRUPT ORGANIZATION

4. WHERE CRIME(S) COMMITTED:

CITY OF PITTSBURGH, 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
- Affiant and/or other Police Officers corroborated details of the information



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1. Your Affiant is Christopher Minton, a Narcotics Agent II employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your Affiant has been a sworn law enforcement officer since 2006. Previously your Affiant was employed by the Borough of Wilksburg Police Department. In that time I have held multiple positions including that of Patrol Officer, Plain Clothes Officer, Detective, as well as a Full Time Federal Task Force Officer which was assigned to the Greater Pittsburgh Safe Streets Gang Task Force ("GPSSGTF"). This Task Force is operated by the United States Department of Justice, Federal Bureau of Investigation ("FBI").

2. Since October of 2019, your Affiant has been employed by the Pennsylvania Office of Attorney General in the Bureau of Narcotics Investigation and Drug Control. Your Affiant is currently assigned to the Bureau of Narcotics Investigations, Region V. As a Narcotics Agent of the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control, your Affiant is empowered by law to conduct investigations of, and to make arrests for offenses involving violations of the Controlled Substance, Drug, Device and Cosmetic Act and related offenses under the Pennsylvania Crimes Code, Title 18. Your Affiant, while employed as a Narcotics Agent II, Wilksburg Police Officer and a Federally Deputized Task Force Officer, has been involved in many investigations concerning narcotics violations of the Controlled Substance, Drug, Device and Cosmetic Act. Furthermore, your Affiant has debriefed numerous informants, drug users and drug dealers about illegal drug trafficking, the codes and cryptic language used by drug users and drug dealers, and the methods and practices used by drug dealers in furtherance of their drug trafficking enterprises.

3. Your Affiant has attended advanced narcotics training sponsored by the Northeast Counter Drug Training Center, Pennsylvania Narcotics Officer Association and the United States Department of Justice. Your Affiant as a Federally Deputized Task Force Officer was empowered to conduct investigations of persons who engage in drug trafficking offenses.

4. Based on my experience and the experience of others, I am familiar with matters including, but not limited to, the means and methods used by persons and drug trafficking organizations to purchase, transport, store, and distribute drugs, and to hide profits generated from those transactions. Based on my training and experience, I am aware that it is common practice for drug traffickers to conduct and facilitate drug-related activities through their cell phones, vehicles, residences and other methods as well.

5. As part of your Affiant's duties relating to the GPSSGTF, and in the course of my participation in multiple wiretap investigations, I have reviewed thousands of communications between drug traffickers. As a result of my narcotics-related training and experience, I am familiar with the methods and language used to distribute narcotics, to launder proceeds, and to participate and or operate drug-trafficking conspiracies.

6. On May 23rd 2022, the Forty-Eighth Statewide Investigating Grand Jury issued Presentment No. 3 recommends the arrest of William Ely, Jaylon Brock and Tony Burnsworth, for violations of the Pennsylvania Crimes Code and the Pennsylvania Controlled Substance, Drug and Device and Cosmetic Act, Act No. 64. The aforementioned presentment was accepted by the Honorable Anthony M. Mariani, Supervising Judge of the Forty-Eight Statewide Investigation Grand Jury by order dated May 23rd, 2022. A copy of the Presentment and Order accepting the Presentment are attached hereto and incorporated herein by reference, having read and reviewed the Presentment, and after participating in the investigation and considering all of the facts and circumstances, your Affiant is adopting the Presentment and incorporating it fully into this affidavit of probable cause.

7. Your Affiant avers that the testimony the individuals who appeared before the Forty-Eighth Statewide Investigating Grand Jury is consistent with the information contained within the Presentment No. 3 shows on its face that it is based upon evidence, which the Forty-Eighth Statewide Investigating Grand Jury reviewed and evaluated, including the sworn testimony of witnesses appearing and evidence presented. Your Affiant has reviewed the evidence presented before the Forty-Eighth Statewide Investigating Grand Jury and finds that comports the findings of the general investigation conducted by the Office of Attorney General, Bureau of Narcotics Investigation and Drug Control.




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I, CHRISTOPHER MINTON, 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.

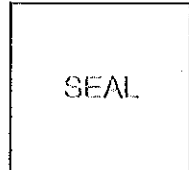
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

/CHRISTOPHER MINTON/ 
(Signature of Affiant)

Sworn to me and subscribed before me this 15 day of August, 2022

_____, Date _____, Magisterial District Judge

My commission expires first Monday of January, 2025



INTRODUCTION

We, the members of the Forty Eighth Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to violations of the Controlled Substance, Drug, Device and Cosmetic Act and the Pennsylvania Crimes Code occurring in Allegheny County pursuant to Notice of Submission of Investigation No. 5, do hereby make the following findings of fact and recommendation of charges.

OVERVIEW

The Grand Jury conducted an investigation into a drug-distribution ring operated by William Ely ("Ely") in Allegheny County. Following a series of controlled buys, investigators ultimately seized 769 grams of cocaine and 79.7 grams of heroin/fentanyl from Ely's residence. During the investigation into Ely's drug dealing activities, two mid-level dealers - - Tony Burnsworth ("Burnsworth") and Jaylon Brock ("Brock") - - were identified as being supplied by Ely. An interdiction of Burnsworth subsequently led to the seizure of 35 bricks (50 individual glassine or "stamp" bags) of heroin/fentanyl and one-half of an ounce of cocaine. Four controlled purchases of heroin/fentanyl from Brock led to the execution of a search warrant wherein more than 36 grams of heroin/fentanyl were seized.

FINDINGS OF FACT

The Grand Jury heard testimony that Narcotics Agent Christopher Minton ("NA Minton") of the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control developed a confidential informant ("CI-1") who identified Ely as his/her supplier of cocaine and further advised that Ely was also a large-scale heroin dealer. CI-1 provided agents with detailed information about one of Ely's customers who purchased between 30 and 50 bricks of heroin from Ely on a regular basis. CI-1 advised that Ely planned to meet with this customer on June 1, 2021 in the Hill District section of Pittsburgh, Allegheny County and described the vehicle that the customer utilized. Armed with that information, investigators set up surveillance at 3516 Camp Street in the Hill

Distriet which CI-1 identified as a residence that Ely used to store/stash drugs. Ely was observed leaving the Camp Street residence and was followed to Dakota Street. There, Ely met a male who was later identified as Burnsworth. Following this meeting, Burnsworth left the area in his vehicle. The vehicle was later stopped by a Pittsburgh City police officer and the driver was taken into custody on an outstanding arrest warrant. The sole passenger in the vehicle was Burnsworth. After receiving his *Miranda* warnings, Burnsworth agreed to speak to NA Minton and gave consent to search his vehicle. Investigators recovered 35 bricks of fentanyl weighing 30 grams and 13.45 grams of cocaine from a hidden compartment within the vehicle.¹ Burnsworth admitted that he had just purchased the heroin and cocaine from Ely. Burnsworth explained that he had been purchasing increasing quantities of heroin/fentanyl from Ely for the past nine months and returning to Somerset County with the controlled substances. As of the time of the traffic stop, Burnsworth had been purchasing 35 bricks of heroin/fentanyl every three-to-four days so that he could re-sell the drugs to his customers in Somerset County. Burnsworth identified text messages between himself and Ely which detailed purchases that Burnsworth made on the following dates: April 2, 2021; April 5, 2021; April 27, 2021; May 3, 2021; May 4, 2021; May 5, 2021; and, June 1, 2021. Burnsworth subsequently agreed to cooperate with investigators and make purchases from Ely.

Burnsworth made a total of three controlled purchases of heroin/fentanyl from Ely under the direction of NA Minton. Prior to each purchase, Burnsworth and his vehicle were searched and found to be free of contraband and currency. Following each purchase, Burnsworth provided agents with the heroin/fentanyl that he had obtained from Ely. He and his vehicle were then searched again and found to be free of contraband and currency.

¹ All weights and controlled substance identifications set forth in this Presentment were confirmed through analysis at the Pennsylvania State Police Crime Laboratory.

The Grand Jury heard testimony that the first controlled purchase involving Burnsworth took place on June 7, 2021. Surveillance was set up in the area of 3516 Camp Street, as well as Ely's residence at 1932 Wright Street in Wilkinsburg, Allegheny County. Burnsworth sent a text message to Ely and arranged to purchase 35 bricks of heroin. Ely then directed Burnsworth to go to Dakota Street in the Hill District. Investigators provided Burnsworth with pre-recorded funds in order to make the purchase. Investigators observed Ely leave the Camp Street residence carrying a white bag. Thereafter, both Burnsworth and Ely were followed by separate surveillance teams as they drove to the meeting location. NA Minton was in front of both vehicles as they entered a desolate section of Alpena Street. At that time, NA Minton lost sight of both vehicles for approximately ten seconds. It should be noted, however, that there were no other vehicles or individuals present in this area. After that brief period of time, the two vehicles were observed in the area where Alpena Street turns into Andover Terrace. From that point, one surveillance team followed Burnsworth to a pre-determined location while the second surveillance team followed Ely back to his Wright Street residence. At the pre-determined location, Burnsworth turned over 35 bricks of heroin/fentanyl totaling 36.8 grams that he had obtained from Ely.

The second controlled purchase with Ely occurred on July 6, 2021. Burnsworth called Ely to set up a purchase of 35 bricks of heroin in the Hill District. During the call, Ely instructed Burnsworth to stop using the telephone number that Burnsworth had called and provided him with a new telephone number. Surveillance was then set up on Ely at the Wright Street address. While he was driving, Ely became aware that he was being followed. Ely contacted Burnsworth and directed him to a new location. Later, Ely instructed Burnsworth to just drive around the Hill District and await further instruction. At one point, Ely was observed driving to and entering the Camp Street residence. He then left the residence carrying a blue plastic grocery bag. Ultimately, Burnsworth met with Ely on Iowa Street in the Hill District where he got into Ely's vehicle. Ely drove a short distance and then the surveillance team lost sight of the vehicle for a brief period of time. Ely ultimately dropped off

Burnsworth who drove to a pre-determined meeting location. There, he turned over 15 bricks of heroin/fentanyl weighing 10.6 grams that was contained within a blue plastic grocery bag. Burnsworth explained to investigators that Ely would only sell 15 bricks of heroin to him for \$2,150.00 and so he returned the unused pre-recorded buy money.

The third and final controlled purchase from Ely occurred on July 27, 2021. Through a series of text messages and a telephone call, Ely directed Burnsworth to meet him on Boggs Avenue in Wilkinsburg. Burnsworth was provided pre-recorded currency for the purchase and was followed to the Boggs Avenue address. A second surveillance team followed Ely from his Wright Street residence to the Boggs Avenue address. Both Ely and Burnsworth were observed entering 2027 Boggs Avenue. A short time later, both men left the residence and entered Ely's black Ford Explorer. Burnsworth remained in the vehicle for a brief period of time before he got out and returned to a pre-determined meeting location. At the meeting location, Burnsworth turned over 35 bricks, consisting of 27.5 grams of heroin/fentanyl.

NA Minton subsequently obtained search warrants for 3516 Camp Street, 1932 Wright Street and Ely's black Ford Explorer. All of the search warrants were executed on July 30, 2021. While officers and agents were outside of the Wright Street address, Ely exited the house. Ely was approached and advised of the search warrant. Ely then provided a key for entry. Inside the residence, the following items were seized: 1) FN 9mm pistol loaded with 22 rounds and one in the chamber located in a black purse in the living room; 2) AeroPrecision 5.56 assault rifle loaded with 28 rounds and one round in the chamber located just inside entry door; 3) 40 Caliber Glock magazine located in the living room;; 4) \$8,500.00 located on a coffee table in the living room; 5) \$134,815.00 located in a hidden compartment of a nightstand in the master bedroom; 6) Indicia linking Ely to 3516 Camp Street and 1932 Wright Street; 7) Black digital scale with residue that field-tested positive for the presence of

cocaine located in the living room; and, 8) Black iPhone used by Ely in connection with the controlled purchases with Burnsworth.

Ely was searched and investigators recovered \$120,00 along with a black iPhone. Agents confirmed that the telephone number associated with the black iPhone was the same number that Burnsworth had originally used to contact Ely. The Ford Explorer was searched and two 9mm magazines were located.

While the Wright Street residence was being searched, a second team searched 3516 Camp Street and the following items were seized: 1) Three digital scales;² 2) Utility letter addressed to Ely at 3516 Camp Street; 3) Cut open vacuum seal bag containing cocaine residue; 4) Eight bricks of heroin/fentanyl located in the living room closet consisting of 16.6 grams of flourofentanyl; 5) Zip-lock bag containing approximately 40 bags consisting of 10.6 grams of heroin/fentanyl/flourofentanyl located in the living room closet; 6) Mechanical steel kilogram press located in the kitchen closet; 7) 5000 milligram Creatine container containing a white powder that contained no controlled substances; 8) 10 stamp bags on the kitchen counter containing 2.8 grams of heroin/fentanyl; 9) Fifty bricks consisting of 33.8 grams of heroin/fentanyl located behind the microwave in the kitchen; 10) Three bundles consisting of 8.3 grams of heroin/fentanyl behind the microwave; 11) Brick of heroin/flourofentanyl consisting of 10.4 grams located on steps to the attic; and, 12) Wrapped bag of 769 grams of cocaine located in the attic.

Ely was interviewed following the execution of the search warrants and he admitted that the drugs belonged to him. NA Minton testified that Ely has multiple felony convictions for violations of the Controlled Substance, Drug, Device and Cosmetic Act and therefore he is prohibited from legally possessing any firearms.

² Field tests were performed and the presence of cocaine was detected on two of the scales. The presence of marijuana was detected on one of the scales.

Narcotics Agent Justin Shaffer ("NA Shaffer") testified about his investigation into Brock, one of Ely's customers. He explained that following the June 7, 2021 controlled purchase by Burnsworth, Ely was followed to his residence on Wright Street. He was then followed to 204 Barckhoff Street in Penn Hills, Allegheny County. CI-1 was with Ely. When Ely arrived, he exited his vehicle carrying a small black satchel and then entered the Barckhoff Street residence. After a brief period of time, he exited and returned to his vehicle. When Ely left the residence, a male later identified as Brock also exited and waited until Ely departed in his vehicle. CI-1 relayed to NA Minton that Ely had delivered 50 bricks of heroin to a male known to him as "Young Buck" while Ely was at the Barckhoff Street residence.

On June 8, 2021, NA Shaffer returned to Barckhoff Street in order to conduct surveillance. NA Shaffer followed Brock from his residence on Barckhoff Street to 632 Watt Street in the Hill District, which was later determined to be the home of Brock's father. NA Shaffer testified that he observed Brock meet with an individual in front of the residence. After the individual drove off, a traffic stop was conducted and a brick of fentanyl was recovered. This individual identified Brock as the person who had just sold him/her the fentanyl. It was subsequently determined that the recovered fentanyl also contained tramadol and weighed 1.86 grams.

Following the traffic stop, the individual agreed to become a confidential informant ("CI-2") and make purchases from Brock. The Grand Jury learned that CI-2 made a total of four controlled purchases from Brock and each sale occurred at the Watt Street address while Brock was under surveillance. CI-2 and his/her vehicle were searched before and after each controlled purchase and it was determined that there was no contraband or currency present. CI-2 was provided with pre-recorded currency prior to each purchase. The chart below summarizes the details of the purchases:

Date of purchase	Weight of substance	Substance
June 16, 2021	1.88 grams	Fentanyl
July 20, 2021	.71 grams	Fentanyl
August 4, 2021	1.62 grams	Fentanyl
August 31, 2021	1.84 grams	Fentanyl

Following the final controlled purchase, NA Shaffer obtained a search warrant for the 632 Watt Street residence. On September 1, 2021 the search warrant was executed and agents seized 142 bricks of fentanyl weighing a total of 255.2 grams and 19.1 grams of cocaine. Agents also seized indicia that connected Brock to the residence, a red cup with white powder residue, and, a digital scale.

As the Watt Street search warrant was being executed, a second team was conducting surveillance on the Barckhoff Street residence. Brock was observed exiting the home and departing in his vehicle. A traffic stop was subsequently conducted. Brock was advised that a search warrant was being executed on the Watt Street residence. After receiving his *Miranda* warnings, Brock initially stated that there were only 20 bricks of heroin and two pounds of marijuana at the residence. However, once NA Shaffer showed Brock his telephone which displayed a photograph of the fentanyl recovered from the residence, Brock stated, "All right, that's it, that's the 150. That's all I got." Brock then gave consent to search his vehicle and two cellular telephones were recovered. During an interview at the Penn Hills Police Department, Brock identified Ely as his supplier.

While Brock was being transported, NA Shaffer and Supervisory Narcotics Agent Andrew Toth ("SNA Toth") returned to the Barckhoff Street residence. They knocked on the door and met with Adaire Wallace ("Wallace"). Wallace gave consent to search the house. SNA Toth recovered \$10,600.00 from a blue purse in the master bedroom. It was later determined this sum of money contained the \$160.00 pre-recorded buy money that was used by CI-2 to purchase fentanyl from Brock on August 4, 2021. In the basement, NA Shaffer found 41 bricks of fentanyl under the steps and 30 stamp bags in the rafters. The fentanyl had a combined weight of 36.19 grams.

The Grand Jury heard testimony that search warrants were obtained to search the contents of the telephones recovered from Brock's vehicle. An iPhone with telephone number (412) 287-2420 was determined to be the same number that CI-2 used to contact Brock for the controlled purchases. NA Shaffer testified that the iPhone contained records of FaceTime calls with telephone number (412) 377-6754, which was the telephone number assigned to one of the telephones recovered from Ely when the Wright Street residence search warrant was executed. Additionally, when agents checked the currency that had been seized from Ely that day, they located \$100.00 of pre-recorded funds used by CI-2 to purchase fentanyl from Brock on June 16, 2021.

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: (NAME and ADDRESS):
TONY LEWIS BURNSWORTH
First Name Middle Name Last Name Gen.

444 TWIN HILLS ROAD FRIDENS, PA 15541

Phone: 412.350.6715

NCIC Extradition Code Type

Felony - Limited Extradition

Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-4164-22	Date Filed 8/15/2022	OTN/LiveScan Number G 914415-5	Complaint/Incident Number ASAP-684710/BN5210105H	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 07/21/1978	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 BLU (BLUE)		
DNA	DNA Location			WEIGHT (lbs.) 230
FBI Number	MNU Number		Ft. HEIGHT In. 5 08	
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, CHRISTOPHER MINTON 35868
(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 301 PITTSBURGH CITY
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County 02 on or about 06/01/2021 0:00
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 914415-5	Complaint/Incident Number ASAP-684710/BN5210105H
Defendant Name	First: TONY	Middle: LEWIS	Last: BURNSWORTH

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	911	B3	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description/Acts of the accused associated with this Offense:									
18 911B3 CORRUPT ORGANIZATION F1 1 COUNT									
The actor, employed by or associated with an enterprise, conducted or participated, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, namely, Act 64 in violation of 18 Pa. C.S. §911(b)(3).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
	2	911	B4	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description/Acts of the accused associated with this Offense:									
18 911B4 CORRUPT ORGANIZATION F1 1 COUNT									
The actor conspired with William Ely to violate any of the provisions of subsections (1),(2) or (3) of Section 911(b) of the Pennsylvania Crimes Code, in violation of 18 Pa. C.S. §911(b)(4).									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 914415-5	Complaint/Incident Number ASAP-684710/BN5210105H
Defendant Name	First: TONY	Middle: LEWIS	Last: BURNSWORTH

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	7512	A	of the	18	1	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 7512A CRIMINAL USE OF COMMUNICATION FACILITY F3 1 COUNT									
The actor used a communication facility to commit, cause, or facilitate the commission or the attempted commission of a crime constituting a felony under Title 18 of the Pennsylvania Crimes Code, or a felony under the Controlled Substance Drug Device and Cosmetic Act namely, Cellular devise to organized drug transactions, in violation of 18 Pa.C.S.§ 7512.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	4	903	(A)(1)	of the	18	1	F	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:									
18 903(A)(1) CRIMINAL CONSPIRACY F 1 COUNT									
The actor, with the intent of promoting or facilitating the crime of 35: 780-113 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV: A30 conspired and agreed with William Ely 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:	Date Filed:	OTN/LiveScan Number G 914415-5	Complaint/Incident Number ASAP-684710/BN5210105H
Defendant Name	First: TONY	Middle: LEWIS	Last: BURNSWORTH

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	5	780-113	A30	of the	35	2	F	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:									
35 780-113A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV F 2 COUNTS									
The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, possessed with intent to deliver a controlled substance, namely, Fentanyl, in violation of 35 P.S. §780-113(a) (30).									
The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, possessed with intent to deliver a controlled substance, namely, Cocaine, in violation of 35 P.S. §780-113(a) (30).									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	6	903	(A)(1)	of the	18	1	M	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:									
18 903(A)(1) CRIMINAL CONSPIRACY M 1 COUNT									
The actor, with the intent of promoting or facilitating the crime of 35: 780-113 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV: A30 conspired and agreed with William Ely 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:	Date Filed:	OTN/LiveScan Number G 914415-5	Complaint/Incident Number ASAP-684710/BN5210105H
Defendant Name	First: TONY	Middle: LEWIS	Last: BURNSWORTH

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	7	780-113	A16	of the	35	2	M	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:									
35 780-113A16 PROHIBITED ACTS - POSSESSION M 2 COUNTS									
The actor knowingly or intentionally possessed a controlled or counterfeit substance, namely, Fentanyl the said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board, in violation of 35 P.S. §780-113(a)(16).									
The actor knowingly or intentionally possessed a controlled or counterfeit substance, namely, Cocaine the said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board, in violation of 35 P.S. §780-113(a)(16).									



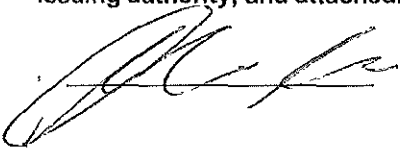
POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 914415-5	Complaint/Incident Number ASAP-684710/BN5210105H
Defendant Name	First: TONY	Middle: LEWIS	Last: BURNSWORTH

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

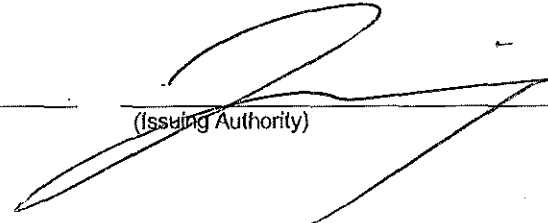
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)


 _____ 08/05/2022 _____ /CHRISTOPHER MINTON/
(Date) (Signature of Affiant)

AND NOW, on this date 8.15.22 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.

 _____ (Magisterial District Court Number)

 _____ (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 914415-5	Complaint/Incident Number ASAP-684710/BN5210105H
Defendant Name	First: TONY	Middle: LEWIS	Last: BURNSWORTH

AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

a) Date when Affiant received information:

6/1/2021

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

6/1/2021

2. HOW:

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

Personal Observation, Defendants Admissions

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

Personal Observation, Defendants Admissions

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

Personal Observation, Defendants Admissions

3. WHAT CRIMES:

18 903 (A)(1) CRIMINAL CONSPIRACY

18 903 (A)(1) CRIMINAL CONSPIRACY

18 911 B4 CORRUPT ORGANIZATION

18 7512 A CRIMINAL USE OF COMMUNICATION FACILITY

18 911 B3 CORRUPT ORGANIZATION

35 780-113 A16 PROHIBITED ACTS - POSSESSION

35 780-113 A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV

35 780-113 A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV

35 780-113 A16 PROHIBITED ACTS - POSSESSION

4. WHERE CRIME(S) COMMITTED:

CITY OF PITTSBURGH, 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

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



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 914415-5	Complaint/Incident Number ASAP-684710/BN5210105H
Defendant Name	First: TONY	Middle: LEWIS	Last: BURNSWORTH

1. Your Affiant is Christopher Minton, a Narcotics Agent II employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your Affiant has been a sworn law enforcement officer since 2006. Previously your Affiant was employed by the Borough of Wilkesburg Police Department. In that time I have held multiple positions including that of Patrol Officer, Plain Clothes Officer, Detective, as well as a Full Time Federal Task Force Officer which was assigned to the Greater Pittsburgh Safe Streets Gang Task Force ("GPSSGTF"). This Task Force is operated by the United States Department of Justice, Federal Bureau of Investigation ("FBI").

2. Since October of 2019, your Affiant has been employed by the Pennsylvania Office of Attorney General in the Bureau of Narcotics Investigation and Drug Control. Your Affiant is currently assigned to the Bureau of Narcotics Investigations, Region V. As a Narcotics Agent of the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control, your Affiant is empowered by law to conduct investigations of, and to make arrests for offenses involving violations of the Controlled Substance, Drug, Device and Cosmetic Act and related offenses under the Pennsylvania Crimes Code, Title 18. Your Affiant, while employed as a Narcotics Agent II, Wilkesburg Police Officer and a Federally Deputized Task Force Officer, has been involved in many investigations concerning narcotics violations of the Controlled Substance, Drug, Device and Cosmetic Act. Furthermore, your Affiant has debriefed numerous informants, drug users and drug dealers about illegal drug trafficking, the codes and cryptic language used by drug users and drug dealers, and the methods and practices used by drug dealers in furtherance of their drug trafficking enterprises.

3. Your Affiant has attended advanced narcotics training sponsored by the Northeast Counter Drug Training Center, Pennsylvania Narcotics Officer Association and the United States Department of Justice. Your Affiant as a Federally Deputized Task Force Officer was empowered to conduct investigations of persons who engage in drug trafficking offenses.

4. Based on my experience and the experience of others, I am familiar with matters including, but not limited to, the means and methods used by persons and drug trafficking organizations to purchase, transport, store, and distribute drugs, and to hide profits generated from those transactions. Based on my training and experience, I am aware that it is common practice for drug traffickers to conduct and facilitate drug-related activities through their cell phones, vehicles, residences and other methods as well.

5. As part of your Affiant's duties relating to the GPSSGTF, and in the course of my participation in multiple wiretap investigations, I have reviewed thousands of communications between drug traffickers. As a result of my narcotics-related training and experience, I am familiar with the methods and language used to distribute narcotics, to launder proceeds, and to participate and or operate drug-trafficking conspiracies..

6. On May 23rd 2022, the Forty-Eighth Statewide Investigating Grand Jury issued Presentment No. 3 recommends the arrest of William Ely, Jaylon Brock and Tony Burnsworth, for violations of the Pennsylvania Crimes Code and the Pennsylvania Controlled Substance, Drug and Device and Cosmetic Act, Act No. 64. The aforementioned presentment was accepted by the Honorable Anthony M. Mariani, Supervising Judge of the Forty-Eight Statewide Investigation Grand Jury by order dated May 23rd, 2022. A copy of the Presentment and Order accepting the Presentment are attached hereto and incorporated herein by reference, having read and reviewed the Presentment, and after participating in the investigation and considering all of the facts and circumstances, your Affiant is adopting the Presentment and incorporating it fully into this affidavit of probable cause.

7. Your Affiant avers that the testimony the individuals who appeared before the Forty-Eighth Statewide Investigating Grand Jury is consistent with the information contained within the Presentment No. 3 shows on its face that it is based upon evidence, which the Forty-Eighth Statewide Investigating Grand Jury reviewed and evaluated, including the sworn testimony of witnesses appearing and evidence presented. Your Affiant has reviewed the evidence presented before the Forty-Eighth Statewide Investigating Grand Jury and finds that comports the findings of the general investigation conducted by the Office of Attorney General, Bureau of Narcotics Investigation and Drug Control.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 914415-5	Complaint/Incident Number ASAP-684710/BN5210105H
Defendant Name:	First: TONY	Middle: LEWIS	Last: BURNSWORTH

I, CHRISTOPHER MINTON, 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.

/CHRISTOPHER MINTON/

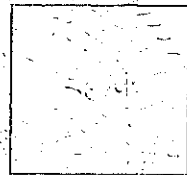
(Signature of Affiant)

Sworn to me and subscribed before me this 15 day of August, 2022

Date

, Magisterial District Judge

My commission expires first Monday of 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: (NAME and ADDRESS):
JAYLON AMOD BROCK
First Name Middle Name Last Name Gen.
204 BARCKHOFF STREET PITTSBURGH, PA 15235

Phone: 412.350.6715

NCIC Extradition Code Type

Felony - Limited Extradition

Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-4162-2022	Date Filed 8-15-2022	OTN/LiveScan Number G 914413-3	Complaint/Incident Number ASAP-684709/BN5210105H	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 08/28/1989	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)			
DNA	DNA Location			WEIGHT (lbs.) 140
FBI Number	MNU Number			FL. HEIGHT In. 5 07
Defendant Fingerprinted				5 07
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, CHRISTOPHER MINTON 35868
(Name of the Affiant) (FSP/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 301 PITTSBURGH CITY
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County 02 on or about 06/01/2021 0:00
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 914413-3	Complaint/Incident Number ASAP-684709/BN5210105H
Defendant Name	First: JAYLON	Middle: AMOD	Last: BROCK

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	911	B3	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description/Acts of the accused associated with this Offense:									
18 911B3 CORRUPT ORGANIZATION F1 1 COUNT									
The actor, employed by or associated with an enterprise, conducted or participated, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, namely, Act 64 in violation of 18 Pa. C.S. §911(b)(3).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
	2	911	B4	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description/Acts of the accused associated with this Offense:									
18 911B4 CORRUPT ORGANIZATION F1 1 COUNT									
The actor conspired with William Ely to violate any of the provisions of subsections (1),(2) or (3) of Section 911(b) of the Pennsylvania Crimes Code, in violation of 18 Pa. C.S. §911(b)(4).									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 914413-3	Complaint/Incident Number ASAP-684709/BN5210105H
Defendant Name	First: JAYLON	Middle: AMOD	Last: BROCK

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	7512	A	of the	18	1	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 7512A CRIMINAL USE OF COMMUNICATION FACILITY F3 1 COUNT									
The actor used a communication facility to commit, cause, or facilitate the commission or the attempted commission of a crime constituting a felony under Title 18 of the Pennsylvania Crimes Code, or a felony under the Controlled Substance Drug Device and Cosmetic Act namely, Cellular devise to organized drug transactions, in violation of 18 Pa.C.S.§ 7512.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	4	903	(A)(1)	of the	18	1	F	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:									
18 903(A)(1) CRIMINAL CONSPIRACY F 1 COUNT									
The actor, with the intent of promoting or facilitating the crime of 35: 780-113 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV: A30 conspired and agreed with William Ely 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

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Defendant Name	First: JAYLON	Middle: AMOD	Last: BROCK

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	5	780-113	A30	of the	35	2	F	NCIC Offense Code	UCR/NIBRS Code
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade		
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:									
35 780-113A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV F 2 COUNTS									
The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, possessed with intent to deliver a controlled substance, namely, Fentanyl, in violation of 35 P.S. §780-113(a) (30).									
The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, possessed with intent to deliver a controlled substance, namely, Fentanyl, in violation of 35 P.S. §780-113(a) (30).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	6	903	(A)(1)	of the	18	1	M	NCIC Offense Code	UCR/NIBRS Code
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade		
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:									
18 903(A)(1) CRIMINAL CONSPIRACY M 1 COUNT									
The actor, with the intent of promoting or facilitating the crime of 35: 780-113 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV: A30 conspired and agreed with William Ely 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:	Date Filed:	OTN/LiveScan Number G 914413-3	Complaint/Incident Number ASAP-684709/BN5210105H
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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	7	780-113	A16	of the	35	2	M	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:									
35 780-113A16 PROHIBITED ACTS - POSSESSION M 2 COUNTS									
The actor knowingly or intentionally possessed a controlled or counterfeit substance, namely, Fentanyl the said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board, in violation of 35 P.S. §780-113(a)(16).									
The actor knowingly or intentionally possessed a controlled or counterfeit substance, namely, Fentanyl the said actor not then and there being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, or a practitioner registered or licensed by the appropriate State Board, in violation of 35 P.S. §780-113(a)(16).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	8	780-113	A32	of the	35	1	M	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:									
35 780-113A32 PROHIBITED ACTS M 1 COUNT									
The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, used or possessed with intent to use drug paraphernalia for the purpose of planting, propagating, cultivating, growing, harvesting, manufacturing, compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, injecting, ingesting, inhaling or otherwise introducing into the human body, a controlled substance, in violation of 35 P.S. §780-113(a) (32).									

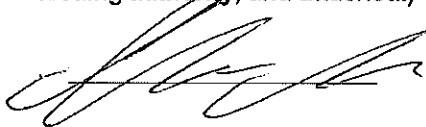


POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 914413-3	Complaint/Incident Number ASAP-684709/BN5210105H
Defendant Name	First: JAYLON	Middle: AMOD	Last: BROCK

- 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.)



08/05/2022

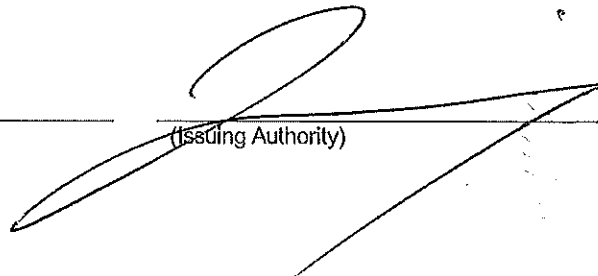
/CHRISTOPHER MINTON/
 (Signature of Affiant)

(Date)

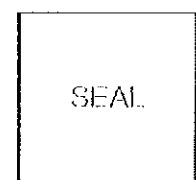
AND NOW, on this date 8-15-22 I certify that the complaint has been properly completed and verified.

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

pmc
 (Magisterial District Court Number)



(Issuing Authority)





POLICE CRIMINAL COMPLAINT

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Defendant Name	First: JAYLON	Middle: AMOD	Last: BROCK

AFFIDAVIT of PROBABLE CAUSE

1. **WHEN:**

- a) Date when Affiant received information:
6/1/2021
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:
6/1/2021

2. **HOW:**

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

3. **WHAT CRIMES:**

- 18 903 (A)(1) CRIMINAL CONSPIRACY
- 18 903 (A)(1) CRIMINAL CONSPIRACY
- 18 911 B4 CORRUPT ORGANIZATION
- 18 7512 A CRIMINAL USE OF COMMUNICATION FACILITY
- 18 911 B3 CORRUPT ORGANIZATION
- 35 780-113 A32 PROHIBITED ACTS
- 35 780-113 A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV
- 35 780-113 A16 PROHIBITED ACTS - POSSESSION
- 35 780-113 A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV
- 35 780-113 A16 PROHIBITED ACTS - POSSESSION

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

CITY OF PITTSBURGH, 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
Affiant and/or other Police Officers corroborated details of the information



POLICE CRIMINAL COMPLAINT

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1. Your Affiant is Christopher Minton, a Narcotics Agent II employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control. Your Affiant has been a sworn law enforcement officer since 2006. Previously your Affiant was employed by the Borough of Wilkesburg Police Department. In that time I have held multiple positions including that of Patrol Officer, Plain Clothes Officer, Detective, as well as a Full Time Federal Task Force Officer which was assigned to the Greater Pittsburgh Safe Streets Gang Task Force ("GPSSGTF"). This Task Force is operated by the United States Department of Justice, Federal Bureau of Investigation ("FBI").

2. Since October of 2019, your Affiant has been employed by the Pennsylvania Office of Attorney General in the Bureau of Narcotics Investigation and Drug Control. Your Affiant is currently assigned to the Bureau of Narcotics Investigations, Region V. As a Narcotics Agent of the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control, your Affiant is empowered by law to conduct investigations of, and to make arrests for offenses involving violations of the Controlled Substance, Drug, Device and Cosmetic Act and related offenses under the Pennsylvania Crimes Code, Title 18. Your Affiant, while employed as a Narcotics Agent II, Wilkesburg Police Officer and a Federally Deputized Task Force Officer, has been involved in many investigations concerning narcotics violations of the Controlled Substance, Drug, Device and Cosmetic Act. Furthermore, your Affiant has debriefed numerous informants, drug users and drug dealers about illegal drug trafficking, the codes and cryptic language used by drug users and drug dealers, and the methods and practices used by drug dealers in furtherance of their drug trafficking enterprises.

3. Your Affiant has attended advanced narcotics training sponsored by the Northeast Counter Drug Training Center, Pennsylvania Narcotics Officer Association and the United States Department of Justice. Your Affiant as a Federally Deputized Task Force Officer was empowered to conduct investigations of persons who engage in drug trafficking offenses.

4. Based on my experience and the experience of others, I am familiar with matters including, but not limited to, the means and methods used by persons and drug trafficking organizations to purchase, transport, store, and distribute drugs, and to hide profits generated from those transactions. Based on my training and experience, I am aware that it is common practice for drug traffickers to conduct and facilitate drug-related activities through their cell phones, vehicles, residences and other methods as well.

5. As part of your Affiant's duties relating to the GPSSGTF, and in the course of my participation in multiple wiretap investigations, I have reviewed thousands of communications between drug traffickers. As a result of my narcotics-related training and experience, I am familiar with the methods and language used to distribute narcotics, to launder proceeds, and to participate and or operate drug-trafficking conspiracies..

6. On May 23rd 2022, the Forty-Eighth Statewide Investigating Grand Jury issued Presentment No. 3 recommends the arrest of William Ely, Jaylon Brock and Tony Burnsworth, for violations of the Pennsylvania Crimes Code and the Pennsylvania Controlled Substance, Drug and Device and Cosmetic Act, Act No. 64. The aforementioned presentment was accepted by the Honorable Anthony M. Mariani, Supervising Judge of the Forty-Eight Statewide Investigation Grand Jury by order dated May 23rd, 2022. A copy of the Presentment and Order accepting the Presentment are attached hereto and incorporated herein by reference, having read and reviewed the Presentment, and after participating in the investigation and considering all of the facts and circumstances, your Affiant is adopting the Presentment and incorporating it fully into this affidavit of probable cause.

7. Your Affiant avers that the testimony the individuals who appeared before the Forty-Eighth Statewide Investigating Grand Jury is consistent with the information contained within the Presentment No. 3 shows on its face that it is based upon evidence, which the Forty-Eighth Statewide Investigating Grand Jury reviewed and evaluated, including the sworn testimony of witnesses appearing and evidence presented. Your Affiant has reviewed the evidence presented before the Forty-Eighth Statewide Investigating Grand Jury and finds that comports the findings of the general investigation conducted by the Office of Attorney General, Bureau of Narcotics Investigation and Drug Control.

