

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY

MDJ: Hon. EUGENE F RIAZZI  
Magisterial District Number: 05-2-13  
Address: 687 O'NEIL BLVD  
MCKEESPORT, PA 15132

Phone: 412.664.4612



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:

(NAME and ADDRESS):

CURTIS M HARPER JR  
First Name Middle Name Last Name Gen.  
3401 O'NEIL BLVD MCKEESPORT, PA 15132

NCIC Extradition Code Type

Felony - Limited Extradition

Distance: 100

DEFENDANT IDENTIFICATION INFORMATION

Docket Number 642-22	Date Filed 12-30-22	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 11/24/1970	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.) 400
FBI Number	MNU Number		Ft HEIGHT In. 6 04	
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. <input checked="" 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, JOSEPH SEABURN / JAMES HINDS	300271 / 40035
(Name of the Affiant)	(PSP/MP/OTC - 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. <input checked="" type="checkbox"/> 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	
304	MCKEESPORT CITY
(Subdivision Code)	(Place-Political Subdivision)
In Allegheny County	02
(County Code)	on or about 02/02/2022 12:00



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

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. PJNS) 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.)

<b>Inchoate Offense</b>	<input type="checkbox"/> <b>Attempt</b> 18 901 A	<input type="checkbox"/> <b>Solicitation</b> 18 902 A	<input type="checkbox"/> <b>Conspiracy</b> 18 903						
X	1	5111	A1	of the	18	2	F1		
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		
<b>Statute Description/Acts of the accused associated with this Offense:</b>									
18 5111A1 DEALING IN THE PROCEEDS OF ILLEGAL ACTIVITY F1 2 COUNTS									
The actor, knowing that the property involved in a financial transaction represented the proceeds of an unlawful activity, conducted a financial transaction which involved the proceeds of the unlawful activity, namely PWID and Delivery of Cocaine with intent to promote the carrying on of the unlawful activity and/or knowing that the transaction was designed in whole or in part to conceal or disguise nature, location, source, ownership or control of the proceeds of unlawful activity and/or to avoid a transaction reporting requirement under State or Federal law, in violation of 18 Pa. C.S. §5111(a)(1) or (2) or (3).									
The actor, knowing that the property involved in a financial transaction represented the proceeds of an unlawful activity, conducted a financial transaction which involved the proceeds of the unlawful activity, namely Pool Selling and Bookmaking with intent to promote the carrying on of the unlawful activity and/or knowing that the transaction was designed in whole or in part to conceal or disguise nature, location, source, ownership or control of the proceeds of unlawful activity and/or to avoid a transaction reporting requirement under State or Federal law, in violation of 18 Pa. C.S. §5111(a)(1) or (2) or (3).									

<b>Inchoate Offense</b>	<input type="checkbox"/> <b>Attempt</b> 18 901 A	<input type="checkbox"/> <b>Solicitation</b> 18 902 A	<input type="checkbox"/> <b>Conspiracy</b> 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
<b>PennDOT Data (if applicable)</b>		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
<b>Statute Description/Acts of the accused associated with this Offense:</b>									
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, PWID/Delivery Delivery of Cocaine and Pool Selling and Bookmaking in violation of 18 Pa. C.S. §911(b)(3).									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

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		
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 Ramone Williams, Robert McClean, Isaiah Warren, Earl McClinton, Majesty Alford, Tanner Yeager, Robert Green, Christopher Robinson, Lynette McClinton, and D.S. 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	2	F2		
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 F2 2 COUNTS The actor, who was previously convicted of 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, in violation of 18 Pa. C.S. §6105 (a) and (a.1)(1). The actor, who was previously convicted of 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, in violation of 18 Pa. C.S. §6105 (a) and (a.1)(1).									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

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		
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 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, to facilitate the delivery of cocaine, in violation of 18 Pa.C.S. § 7512.									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
6	780-113	A30	of the	35	15	F		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

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

## 35 780-113A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV F 15 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered a controlled substance, namely, Cocaine, 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, delivered 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	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, over 1 kilogram cocaine discovered during the execution of a search warrant, 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, Tetrahydrocannabinol (THC) Vaporizer Cartridges, 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?	8	5514	1	of the	18	1	M1	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 55141 POOL SELLING AND BOOKMAKING M1 1 COUNT									
The actor engaged in pool selling or bookmaking, in violation of 18 Pa.C.S. §5514(1).									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

<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						
Lead?	9	5514	3	of the	18	1	M1		
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 55143 POOL SELLING AND BOOKMAKING M1 1 COUNT The actor received, recorded, registered, forwarded, or purported or pretended to forward, to another, any bet or wager upon the result of any political nomination, appointment or election, or upon any contest of any nature, namely College and Professional Sporting Events, in violation of 18 Pa.C.S. §5514(3).									

<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						
Lead?	10	5514	4	of the	18	1	M1		
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 55144 POOL SELLING AND BOOKMAKING M1 1 COUNT The actor became the custodian or depository, for gain or ward, of property staked, wagered or pledged, or to be staked, wagered, or pledged upon the result of a political nomination, appointment or election or any contest of any nature, namely College and Professional Sporting Events, in violation of 18 Pa.C.S. §5514(4).									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

<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					
11	780-113	A16	of the	35	15	M		
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:

## 35 780-113A16 PROHIBITED ACTS - POSSESSION M 15 COUNTS

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).

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).

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).

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).

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).

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).

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).

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).

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,





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

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).

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).

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).

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).

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).

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 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

- 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.)**

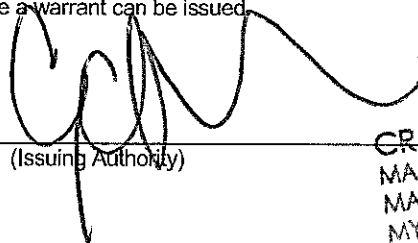
\_\_\_\_\_, 12/30/2022

  
/JOSEPH SEABURN/  
(Signature of Affiant)

AND NOW, on this date 12/30/2022 (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.

05-2-22  
(Magisterial District Court Number)

  
(Issuing Authority)

CRAIG C. STEPHENS,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05/2-22  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2023

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

**AFFIDAVIT of PROBABLE CAUSE****1. WHEN:**

- a) Date when Affiant received information:

2/2/2022

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

2/2/2022

**2. HOW:**

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

Affiant's investigation.

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

Affiant's investigation.

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

Affiant's investigation.

**3. WHAT CRIMES:**

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

18 911 B3 CORRUPT ORGANIZATION  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
18 5111 A1 DEALING IN THE PROCEEDS OF ILLEGAL ACTIVITY  
18 5111 A1 DEALING IN THE PROCEEDS OF ILLEGAL ACTIVITY  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
18 5514 4 POOL SELLING AND BOOKMAKING  
18 911 B4 CORRUPT ORGANIZATION  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
18 7512 A CRIMINAL USE OF COMMUNICATION FACILITY  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
18 5514 1 POOL SELLING AND BOOKMAKING  
35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV  
18 5514 3 POOL SELLING AND BOOKMAKING  
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  
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 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
35 780-113 A16 PROHIBITED ACTS - POSSESSION

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

3401 O'NEIL BLVD



## POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

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
- X 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

1. Your Affiants, Narcotics Agent Joseph Seaburn and Special Agent James T. Hindinger, being duly sworn according to law, aver that the following is true and correct to the best of their knowledge, information and belief and is based on personal knowledge or information provided by reliable sources:

2. The information contained within this affidavit has been received from the investigation conducted to date by your Affiants, other members of the Office of the Attorney General, municipal law enforcement agencies and/or other reliable sources. Your Affiants have personally reviewed the information obtained during the course of this investigation and are familiar with all circumstances of this investigation that have been made available to them. As a result of our training, education and experience, your Affiants have extensive knowledge regarding illegal drugs and the packaging, concealment methods, delivery methods and coded/cryptic language utilized by illegal drug traffickers in the distribution of illegal drugs. Your Affiants are also familiar with the tactics used by illegal drug traffickers to elude the efforts of law enforcement while participating in the distribution of illegal drugs. Furthermore, your Affiants are familiar with the practices, methods, techniques, and equipment commonly used by individuals involved in illegal gambling and bookmaking operations. Your Affiants are familiar with the organizational structures, mechanics, and specific terminology used in gambling and bookmaking operations which will be detailed in subsequent paragraphs below.

3. The Pennsylvania Office of the Attorney General Bureau of Narcotics Investigation, the Pennsylvania Office of the Attorney General Bureau of Criminal Investigations Gaming Unit, and the Allegheny County District Attorney's Narcotics Team (DANET) are conducting an investigation into a large scale cocaine trafficking network in conjunction with an

illegal sports bookmaking operation in and around western Pennsylvania, namely within the City of McKeesport.

4. The investigation commenced in February of 2022 when confidential informant #1 (hereinafter referred to as "CI #1") emerged and provided information concerning Curtis Harper Jr, his associates, his organization and method of their operation. Since then CI #1, has been working with law enforcement in a proactive manner and has demonstrated his/her reliability and veracity. Beginning at diverse dates and times in the winter months of 2022 as part of his/her cooperation CI #1 engaged in proactive roles conducting narcotic purchases with Curtis Harper Jr. CI #1 has provided reliable and verifiable information that your Affiants have corroborated through police surveillance, police intelligence, and recordings produced during the consensual interceptions. Your Affiants have therefore deemed CI #1 to be a reliable source of information.

5. Throughout the investigation, information was received that Curtis Harper Jr is a bookmaker taking in tens of thousands of dollars in sports bets per week. CI #1 stated that Curtis Harper Jr is a high level bookmaker in which he himself takes bets directly from customers. He also accepts layoff bets from lower level bookmakers. CI #1 reported that Curtis Harper Jr. utilizes multiple illegal off-shore gambling websites and applications to manage his bookmaking operation. CI #1 provided specific details as to how Curtis Harper Jr. provided him/her with a user name and password for <http://www.action247.ag>.

6. Factoring together all of the information developed thus far, your Affiants have probable cause to believe and do believe that:

- a. Curtis Harper Jr is the principal of a corrupt organization who engaged in a pattern of racketeering activity, specifically 35 P.S. § 780-113 (a)(30)

Manufacturing, delivering, or possession with intent to distribute and Title 18 PA C.S.A. § 5514, Pool selling and bookmaking.

- b. Curtis Harper Jr did distribute cocaine in violation of 35 P.S § 780-113 (a)(30) Manufacturing, delivering, or possession with intent to distribute.
- c. Curtis Harper Jr did possess with intent to deliver over 1,000 grams of cocaine in violation of 35 P.S § 780-113 (a) (30) Manufacturing, delivering, or possession with intent to distribute.
- d. Curtis Harper Jr did possess with intent to deliver marijuana vape pens and edibles in violation of 35 P.S § 780-113 (a) (30) Manufacturing, delivering, or possession with intent to distribute.
- e. Curtis Harper Jr did utilize a communications facility, specifically an Apple iPhone 8 and the T-Mobile phone number 412-537-8372 to facilitate the commission of a crime in violation of Title 18 PA C.S.A. § 7512, Criminal use of a communication facility.
- f. Curtis Harper Jr did conduct financial transactions with knowledge that the property involved represented the proceeds of unlawful activities in violation of Title 18 PA C.S.A. § 5111, Dealing in proceeds of unlawful activities. Namely, 35 P.S § 780-113 (a) (30) Manufacturing, delivering, or possession with intent to distribute cocaine and Title 18 PA C.S.A. § 5514, Pool selling and bookmaking.
- g. Curtis Harper Jr did possess a firearm(s), namely a 12 Gauge Shotgun (S/N AB315628M) and a Ruger 7MM rifle (S/N 782-70992), being a person



convicted of an offense enumerated in subsection (b) of Title 18 PA C.S.A. § 6105, Persons not to possess, use, manufacture, control, sell or transfer firearms.

- h. Curtis Harper Jr did operate an illegal sports bookmaking operation throughout Western Pennsylvania, specifically in Allegheny County in violation of Title 18 PA C.S.A. § 5514, Pool selling and bookmaking
- i. Curtis Harper Jr. did utilize the website <https://www.action247.ag> to facilitate his illegal bookmaking operation in violation Title 18 PA C.S.A. § 5514, Pool selling and bookmaking.

7. The facts that support the aforementioned charges are outlined below:

8. The investigation began when your Affiant met with CI #1. During the interview CI #1 stated that he/she has been involved in Curtis Harper Jr's illegal narcotics organization for numerous years buying cocaine from Curtis Harper Jr. CI #1 stated that he/she would call the cellular phone of Curtis Harper Jr and order cocaine. At this time Curtis Harper Jr would direct CI #1 to a location where they would meet to complete the deal. CI #1 made a photographic identification of Curtis Harper Jr who had sold cocaine to CI #1 in the past.

9. During the investigation your Affiant met with CI #2. During the interview CI #2 stated that he/she has been involved in Curtis Harper Jr's illegal narcotics organization buying cocaine from Curtis Harper Jr. CI #2 stated that he/she would call the cellular phone of Curtis Harper Jr and order cocaine. At this time Curtis Harper Jr would direct CI #2 to a location where they would meet to complete the deal. CI #2 made a photographic identification of Curtis Harper Jr who had sold cocaine to CI #2 in the past.

10. Throughout the course of this investigation your Affiants have observed during surveillance a specific pattern of behavior engaged in by Curtis Harper Jr. Your Affiants observed

Curtis Harper Jr most days exit his residence at 0600 hours at which time he moves his vehicle (Maroon GMC Sierra PA-ZPX8492) from the top driveway of his residence to the lower side driveway of his residence and/or back to the top driveway of his residence. Similar movements are conducted by Harper Jr. on days when your Affiant's have conducted a controlled purchase and/or subsequently observed Curtis Harper Jr meeting with other individuals while seated within his vehicle. When conducting the controlled purchases of cocaine from Curtis Harper Jr utilizing the confidential informants Curtis Harper Jr acted in a similar manner by moving his vehicle to the lower side driveway of his residence where on some occasions the controlled purchase would take place at that location; and wherein on other occasions, Curtis Harper Jr. would move his vehicle from the lower driveway back to the upper driveway of his residence where the controlled purchase would take place within view of surveillance. For most of these controlled purchases, Curtis Harper Jr remained in the driver seat of his vehicle at which time the confidential informant would meet Curtis Harper Jr either at the driver side window of the stated vehicle or would enter the front passenger seat of the vehicle. Each controlled drug purchase occurred within a short period of time, often within several minutes. As noted above, a similar pattern of behavior by Curtis Harper Jr. has been observed during surveillance when it is believed Harper Jr is conducting drug transactions with other individuals.

11. Curtis Harper Jr is a black male individual standing 6'04" tall, weighing 400 pounds, with brown eyes and black hair. A check with the records maintained by the Pennsylvania Department of Transportation indicates that Curtis Harper Jr possesses Pennsylvania Driver's license number, 22 308 105. Your Affiants have determined that Harper Jr. leases a GMC Sierra, bearing PA license ZPX8492. This a leased vehicle from ACAR Leasing LTD of PA, 4001

Embarcadaro Drive, Arlington, TX. The address indicated on his Pennsylvania license is 3401 O'Neil Blvd McKeesport, PA 15132.

12. A criminal record check conducted through the Pennsylvania State Police Central Repository revealed that Curtis Harper Jr has a criminal record dating back to 1995. Arrest and violations are as follows:

- a. Curtis Harper Jr was charged in the state of Pennsylvania on 4/12/95 with felony cocaine possession to which he pled guilty. On 4/29/96, Curtis Harper Jr was sentenced to 5 years' probation in conjunction with a sentence of 1-2 years' incarceration.
- b. Curtis Harper Jr was also charged by the Drug Enforcement Agency, Pittsburgh Bureau, on 7/19/01 with possession with intent to distribute over 50 grams of crack cocaine. On 2/21/02, Curtis Harper Jr pled guilty and received a sentence of 120 months incarceration, followed by five (5) years of supervised release.

#### **CONTROLLED PURCHASES OF COCAINE**

13. At some date during the month of February 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at what will hereinafter referred to as Target Telephone 1, to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive

reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Agent Snyder observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

14. At some date during the month of February 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Agent Snyder observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

15. At some date during the month of March 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their

training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Agent Snyder observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

16. At some date during the month of March 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Your Affiant, Joseph Seaburn, observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

17. At some date during the month of April 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance

purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Your Affiant, Joseph Seaburn, observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

18. At some date during the month of April 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Your Affiant, Joseph Seaburn, and Agent Castagna observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

19. At some date during the month of May 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1

for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Your Affiant, Joseph Seaburn, Agent Castagna and Agent Snyder observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

20. At some date during the month of June 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Investigators observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

21. At some date during the month of July 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order

a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Investigators observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

22. At some date during the month of August 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Investigators observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.



23. At some date during the month of September 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Investigators observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

24. At some date during the month of September 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police

Crime Lab for testing. Investigators observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

25. At some date during the month of November 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Investigators observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

26. At some date during the month of November 2022, under the direction of your Affiant, CI #1 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #1 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #1 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #1. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The

purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Investigators observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #1.

27. At some date during the month of November 2022, under the direction of your Affiant, CI #2 placed a phone call and / or text message to Curtis Harper Jr at Target Telephone 1 to order a quantity of cocaine. CI #2 arrived at 3401 O'Neil Blvd McKeesport PA as directed by Curtis Harper Jr. The confidential informant met with Curtis Harper Jr, who delivered cocaine to CI #2 for a pre-determined amount of money. During this controlled purchase Agents recovered a quantity of cocaine consistent with the quantity ordered by CI #2. In addition, the substance purchased was packaged in a manner consistent with what your Affiant's know, based upon their training, experience, education and involvement in this investigation, to be cocaine. A field test conducted on a sample of the evidence showed a positive reaction for the presence of cocaine. The purchased cocaine was placed into evidence and has been sent to the Pennsylvania State Police Crime Lab for testing. Investigators observed the meeting and positively identified Curtis Harper Jr as the person who had just delivered the cocaine to CI #2.

#### **ORDER AUTHORIZING INTERCEPTION**

28. On October 27, 2022, an Order (Misc. No. 12-08 W.D. 2022) authorizing the interception of wire and electronic communication of Curtis Harper Jr, 412-537-8372 was signed by the Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania.

29. On November 26, 2022 an extension order authorizing the extension of the interception of wire and electronic communication of Curtis Harper Jr, 412-537-8372 was signed by Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania.

30. **EARL McCLINTON** - During the execution of the incorporated Order authorizing the interception of wire and electronic communications, pertinent communication between Curtis Harper Jr. (Target Telephone 1) and Earl McClinton (412) 956-3245 has been intercepted.

31. On November 2, 2022 at 6:17 PM, Curtis Harper Jr received a phone call from Earl McClinton. A transcript of this conversation is as follows:

- a. EM: "Half."
- b. CH: "Yup, how long?"
- c. EM: "I'm leaving North Versailles."
- d. CH: "Ok."
- e. EM: "Alright."

32. After the call was placed, physical surveillance was deployed and an interdiction was ordered at the direction of your Affiant, Agent Seaburn. At 6:23 PM, electronic surveillance observed Curtis Harper Jr. pull into his residence driving his registered red GMC Sierra pickup truck bearing Pennsylvania registration plate ZPX8492. At 6:33 PM, electronic surveillance observed a reddish/maroon Buick Lacrosse bearing Pennsylvania registration LSA7801 arrive at Curtis Harper Jr's residence (3401 O'Neil Blvd. McKeesport, PA 15132). Agents who were monitoring the electronic video surveillance camera observed a male, positively identified as Earl McClinton, approach the open driver side door of Curtis Harper Jr.'s truck. It appeared that the two engaged in brief conversation before Agents observed an interaction consistent with a drug transaction. Earl McClinton departed the residence in his Buick Lacrosse

33. At 6:37 PM, McKeesport Officer. C. Thomas and TFO S. Summers conducted a traffic stop on Earl McClinton's vehicle in the front of 2807 Freeland Street for an equipment

violation. TFO S. Summers recovered a knotted plastic bag containing thirteen (13) grams of suspected cocaine inside of McClinton's front right pants pocket. The evidence was NIK tested by your Affiant, Agent Seaburn, and produced a positive response for the presence of cocaine.

34. McClinton was transported to the McKeesport Police Department and released after being advised he would receive his charges via summons in the mail.

35. Following his release, McClinton placed a phone call to Curtis Harper Jr. at 8:42 PM. During the conversation, McClinton told Harper Jr. that he was stopped by the police after leaving his house. Harper Jr. asked McClinton if he was stopped by undercover police. McClinton told Harper Jr. that he was stopped by "regular cops" and they "took my shit." Harper Jr. asked if they caught him with the "pop-pop" and then tells him at least he is going to get a summons and not a charge. Curtis Harper Jr then directed McClinton to make sure that he didn't have any weed or anything else in his yard then immediately rephrased and stated, "I mean house". McClinton told Harper, "Yeah, I feel you, I feel you bro, like I said them niggas ain't dancing on me anyway, with that little ass bit of white."

36. The rest of their conversation is transcribed as follows:

- a. EM: "But, umm, damn, I might uh, I still need you to (unintelligible)."
- b. CH: "Uh, alright, I, I got this, I got the whole one, so I don't got the what's its name, just come get the whole one then."
- c. EM: "Alright, give me a minute, I just got to the crib."
- d. CH: "Alright, just text when you're on your way, like just say I'm on my way."
- e. EM: "Alright."

37. At 9:28 PM on this same evening Curtis Harper Jr. received a phone call from Earl McClinton. The conversation was transcribed as follows:

- a. CH: "Yo."
- b. EM: "Yo, yeah, I'm about to leave Christy Park, where'd you want to meet me at?"
- c. CH: "Down here."
- d. EM: "Alright, I'll be there."

38. After the call was placed, electronic surveillance observed Curtis Harper Jr. inside of his GMC Truck at his residence. Curtis Harper Jr. backed his vehicle to the lower side driveway of the residence then returned to the upper driveway of the residence prior to meeting Earl McClinton which is consistent with Curtis Harper Jr's pattern. At 9:37 PM, Earl McClinton pulled behind Curtis Harper Jr., exited his vehicle and got inside the passenger side seat of Curtis Harper Jr.'s truck. At 9:41 PM, Earl McClinton exited the truck and got back into his Buick. Earl McClinton drove away from the residence and Harper Jr. followed him home to 2807 Freeland Street, McKeesport, PA.

39. Based upon your Affiants, education, training, experience, knowledge of this investigation and information gathered during the course of the investigation, it is averred that the above conversation and actions are consistent with Curtis Harper Jr resupplying Earl McClinton with cocaine to replace what was seized by Agents and McKeesport Police during the traffic stop.

40. On November 11, 2022, a series of communications were intercepted which revealed that McClinton was acting as a middle-man/broker for another individual, subsequently identified as Tanner Yeager, conducting a drug transaction with Harper Jr.

41. On November 11, 2022 at 5:18 PM, Curtis Harper Jr (Target Telephone 1) was called by phone number 412-956-3245, a phone subscribed to and used by Earl McClinton. During the conversation, McClinton asked Harper Jr. if he still wanted “them” ; and told Harper Jr. that he would call the other individual back and tell that individual to bring “them.” Harper Jr. called McClinton back at 7:18 PM to ask if he came yet. McClinton told Harper Jr. that they wouldn’t be by until later. Harper Jr. told McClinton that he needs “them” so he can get rid of “them” and that he isn’t buying “them” just to sit on “them”. During subsequent sessions, Harper Jr. directed McClinton to come to his house.

42. On November 11, 2022 Agents set up physical surveillance on Earl McClinton at 2807 Freeland Street McKeesport PA. Agents viewed a vehicle (PA LFS0185) arrive at this residence. Agents viewed Earl McClinton exit the stated residence and walk directly to the vehicle and get in the front passenger seat. Agents then followed the stated vehicle directly to 3401 O’Neil Blvd McKeesport PA. At 8:26 PM, Curtis Harper Jr. (Target Telephone 1) received a text message from 412-956-3245, a phone subscribed to and used by Earl McClinton. The message said, “Pulling up”. During session 20921, Curtis Harper Jr. (Target Telephone 1) received a phone call from 412-956-3245. The call was transcribed as follows:

- a. EM        Alright let me run back in there
- b. CH        Yo
- c. EM        Yea you gave me too much
- d. CH        Ohh I did, I gave you about three thousand
- e. EM        Yea, I’ m at the door
- f. CH        Yea, I gave you, yea, I gave you three, open that door for ‘ em
- g. CH        (background noise: give him that much)

43. On November 11, 2022, physical surveillance units observed a Chevrolet sedan bearing PA registration LFS0185 arrive at the residence of Earl McClinton (2807 Freeland Street McKeesport PA). Agents viewed Earl McClinton get into the front passenger seat of this vehicle at which time his vehicle pulled away from the residence. Agents viewed the stated vehicle travel directly from Freeland Street to the residence of Curtis Harper Jr (3401 O'Neil Blvd McKeesport PA). Agents viewed Earl McClinton exit the stated vehicle and enter Harper Jr's residence where he remained for a few minutes before exiting the residence. McClinton was observed entering the passenger side of the Chevrolet sedan and then again exit the vehicle and return to Harper Jr's residence and shortly thereafter returned to the vehicle. This interaction was consistent with a previous narcotics transaction between McClinton and Harper Jr. Earl McClinton returned to the vehicle he arrived in and traveled directly back to his residence (2807 Freeland Street McKeesport PA) where he exited and went directly inside his residence.

44. At 9:02 PM, after the operator dropped McClinton off at his residence, TFO S. Summers conducted a traffic stop on the aforementioned Chevrolet sedan for an equipment and vehicle code violation. TFO Summers identified the driver as Tanner Yeager. A criminal history check of Yeager revealed he had prior federal convictions for drug offenses. During the traffic stop, TFO Summers recovered four and a half bundles (approx. 45 stamp bags) of suspected heroin / fentanyl and a plastic baggy containing suspected heroin / fentanyl (approx. 7.5 grams). The drugs were field tested with a positive results for fentanyl.

45. Tanner Yeager was transported to the McKeesport Police Department where he was read his Miranda Warnings. Agent Seaburn and Detective Summers then interviewed Tanner Yeager. Tanner Yeager stated to your Affiant that he was in possession of one hundred (100) THC



Weed pens. Through his relationship with Earl McClinton, Yeager stated Earl McClinton knew an individual who was interested in buying all one hundred (100) THC Weed pens for \$15 per pen. This information was validated due to Tanner Yeager having \$1,500 on his person at the time of the arrest. Tanner Yeager admitted to your Affiant that he drove to 2807 Freeland Street McKeesport PA to pick up Earl McClinton. At this time Earl McClinton directed Tanner Yeager to 3401 O'Neil Blvd McKeesport PA. This was verified through surveillance. Tanner Yeager stated that he did not know who Earl McClinton was meeting with and that he only knew the individual was buying the THC Weed pens.

46. On December 4, 2022 at 6:26PM, Curtis Harper Jr (Target Telephone 1) was called by phone number 412-956-3245, a phone subscribed to and used by Earl McClinton. During the conversation Earl McClinton stated, "All right I' m um ah alright I'm goin come get it in like 15 minutes U/I that cool". In subsequent sessions following this Earl McClinton continued to tell Curtis Harper Jr that he was on his way and that he was also arriving at his residence. Surveillance units viewed Curtis Harper Jr back his truck to the lower side lot of the residence then pull his truck back to the front top driveway of the residence. Surveillance units then viewed Earl McClinton arrive at Curtis Harper Jr's residence (3401 O'Neil Blvd McKeesport PA). Agents viewed Earl McClinton go directly to the driver's side door of the residence where Agents positively identified Curtis Harper Jr in the driver's seat of his vehicle. Earl McClinton met with Curtis Harper Jr for only a few seconds which through your Affiants training, experience, and knowledge of the case is consistent with a hand to hand narcotic transaction.

47. Throughout the course of this investigation Agents have intercepted multiple calls between Earl McClinton and Curtis Harper Jr in the manner described above. The contents of these conversations are directly correlated to Curtis Harper Jr's illegal narcotic trafficking organization.

During this investigation, when phone calls and / or text messages were intercepted between Curtis Harper Jr and Earl McClinton, surveillance units were deployed to the area. Meetings between Curtis Harper Jr and Earl McClinton were consistent with a pattern your Affiant has consistently viewed by Curtis Harper Jr when meeting individuals for hand to hand narcotic transactions. Before meeting Earl McClinton, Curtis Harper Jr would back down a side lower driveway then pull his vehicle to the top driveway which has been consistently viewed by your Affiant. When Earl McClinton met with Curtis Harper Jr at his residence this pattern was also viewed yet again. From there surveillance units followed Earl McClinton directly back to his residence 2807 Freeland Street McKeesport PA.

48. **ROBERT McLEAN:** Robert McLean (412-916-6429) has been identified as a co-conspirator in Curtis Harper Jr's drug trafficking organization (DTO). During the execution of the incorporated Order authorizing the interception of wire and electronic communications, pertinent communication between Curtis Harper Jr. (Target Telephone 1) and Robert McLean (412-916-6429) has been intercepted. This phone number (412-916-6429) is subscribed to Robert McLean. The address this phone is subscribed to is 1315 Centennial Street McKeesport, PA. 1315 Centennial St McKeesport, PA is owned by Earnest and Mazie McLean (relatives of Robert McLean).

49. On October 30, 2022 at 1015 hours, Curtis Harper Jr received a text message from telephone number 412-916-6429 (positively identified by Agents as Robert McLean through physical ID). The text conversation is as follows.

- a. RM: "I'm Up"
- b. RM: "Call when outside"
- c. CH: "10:15"

d. RM: "Yep"

50. After the communication took place Curtis Harper Jr was in the front driver's seat his vehicle and backed down the lower driveway toward the kennel area at his residence at 3401 O'Neil Blvd McKeesport, PA at 1015am. Curtis Harper Jr. was then viewed driving from the lower side driveway and leaving his residence in his vehicle at 1017am. Surveillance units were able to maintain surveillance on Curtis Harper Jr to 1615 Shaw Avenue McKeesport, PA. Harpers vehicle was then viewed unoccupied in front of the stated residence at 1020 hours. At 1026am Agents were able to observe four males leaving the residence of 1615 Shaw Avenue McKeesport, PA one of the males being positively identified as Curtis Harper Jr.

51. On November 15, 2022 at 1249 hours, Curtis Harper Jr received a text message from 412-916-6429 (positively identified by Agents as Robert McLean through physical ID). The text conversation is as follows.

- a. RM : "At my house hit me when close"
- b. CH: thumbs up emoji
- c. CH: "1 minute"

52. Concurrent with the communication surveillance was able to view Curtis Harper Jr in the front driver's seat of his vehicle back down the lower driveway toward the kennel area of his residence at 3401 O'Neil Blvd McKeesport, PA at 1:13pm. Curtis Harper Jr was there until 1:17pm when he left the lower side driveway and departed his residence. Surveillance was able to follow Curtis Harper Jr directly to 1615 Shaw Ave McKeesport, PA. Curtis Harper Jr. was viewed at 1615 Shaw Avenue at 1:23pm. Curtis Harper Jr. shortly after departed the residence of 1615 Shaw Ave.

53. On the date of December 6, 2022 at approximately 12:44, Curtis Harper Jr received a text message from 412-916-6429 (positively identified by Agents as Robert McLean through physical ID). The text conversation is as followed:

- a. RM: Centennial St
- b. CH: 30 Minutes

54. After the communication took place Curtis Harper Jr arrived home in his vehicle and backed down the lower driveway toward the kennel area at his residence at 3401 O'Neil Blvd McKeesport, PA. at 1:11pm. Curtis Harper Jr. was then viewed driving from the lower side driveway and leaving his residence in his vehicle at 1:14pm.

55. At 1:19pm, surveillance units viewed Curtis Harper Jr arrive at 1315 Centennial St and backed down the driveway. Prior to Curtis Harper Jr's arrival Robert McLean arrived at the residence and backed down the driveway in a Ford Mustang. At 1:27pm, Curtis Harper Jr was viewed leaving 1315 Centennial St. Robert McLean left 1315 Centennial Street McKeesport PA after Curtis Harper Jr left. Physical surveillance units observed Robert McLean leave 1315 Centennial Street McKeesport, PA and walk back to 1615 Shaw Ave McKeesport, PA.

56. **RAMONE WILLIAMS:** Ramone Williams has been identified as a co-conspirator in Curtis Harper Jr's drug trafficking organization (DTO). During the execution of the incorporated Order authorizing the interception of wire and electronic communications, pertinent communications between Curtis Harper Jr. (Target Telephone 1) and Ramone Williams has been intercepted.

57. On October 27, 2021 at 7:05 PM, Curtis Harper Jr. received an incoming phone call from 412-853-8568, a phone subscribed to Naima Scott but utilized by Ramone Williams. Ramone Williams has been positively identified as the user of this phone on several occasions.

During this conversation Williams told Harper Jr. that he was going to bring him something after he met with an unidentified person. Harper Jr. told him that he, “can’t get them out until the morning” and Williams said that he will just “hold them”.

58. On October 30, 2022 at 1:05 PM, Curtis Harper Jr. received a phone call from 412-853-8568; however, the call went unanswered. At 1:40 PM, Harper Jr. received a text message from 412-853-2568 that said, “Dude with me for swap.” At 1:40 PM, Harper Jr. received another phone call from 412-853-8568 that went unanswered. At 1:42 PM, Harper Jr. and Ramone Williams exchanged several text messages in which Harper Jr. told Williams that he was at a church/meeting event and couldn’t talk. Agents know that Harper Jr. was not at a church or meeting because he was at his residence during these sessions.

59. On October 31, 2022 at 1:54 PM, Curtis Harper Jr. called 412-853-8568, the phone number subscribed to Naima Scott but utilized by Ramone Williams. During this conversation, Williams apologized for trying to contact him so many times on the previous day. He told Harper Jr., “...them niggas was here.” Harper Jr. told Williams that he doesn’t move like that and every time he does, something bad happens. Harper Jr. said that he only moves on his terms, “especially after a bad deal situation...” The rest of the conversation was transcribed as follows:

- a. CH: Curtis Harper Jr                      RW: Ramone Williams
- b. RW: No all good I was just calling to apologize cuz I didn’ t want you to think I was bein naggy I had nuttin to do with it dude. He showed up at my crib like “ Please shoot your cuz shoot your cuz” , and when you didn’ t answer..
- c. CH: Yea but you you gotta be careful when they just poppin up like that shit like you know what I’ m sayin. I know I know dude I know dudes straight but I mean you know shit like that when you got you got you got mafuckin anxious

something to me is just you know what I mean it just it ain' t right to me. You know what I mean.

d. RW: Oh no no no. Okay.

e. CH: Ya know you know what I mean just to it just it just my old ways of of of of being man. Like you know?

f. RW: You the man.

g. CH: Especially when Im spending my money like it ain' t like you givin me shit, you know what I' m sayin? you you tryin to you know you tryin to get me to spend my money and try to rush me and that' s what happened last time. Thinkin I' m gonnna ya know what I mean thinkin I' m getting a nice deal and not fuckin up losin like you know what I mean rushing me so I just take my I just you know that' s the way I am UI.

h. RW: No learn learn learning the process I' m still learning from...

i. CH: Right. See what I' m sayin anytime cuz I can say it ain' t it ain' t like he givin that shit away you know what I mean?

j. RW: Yea when you home man well I' ll just talk to you when I see you but um I' ll just talk to you when I see you. I don' t wanna talk bad um but yeah that' s all I was just callin to hit you I didn' t want you to think I was naggy.

k. CH: It' s cool man I mean I mean I I you know.

l. RW: Alright.

m. CH: Alright, alright cousin.

n. END OF CALL.

60. On November 16, 2022 at 11:13 AM Curtis Harper Jr received an incoming phone call from 412-853-8568, a phone subscribed to Naima Scott but utilized by Ramone Williams. Williams has been positively identified as the user of this phone on several occasions. This was a one minute and twenty second conversation but Agents received "No Audio" on the phone call.

61. At approximately 11:53 AM, Agents were monitoring electronic video surveillance of 3401 O'Neil Blvd, McKeesport, PA when they observed a grey in color Ford F-150 bearing PA registration ZTG5664 approach the area on Porter Street. The vehicle parked adjacent to the upper driveway of Curtis Harper Jr's residence. Curtis Harper Jr. was sitting inside of his truck (2020 GMC Sierra) on Porter Street when the driver of the F-150 exited his vehicle. The driver and registered owner was positively identified as Ramone Williams. Williams was wearing a grey hooded sweatshirt with white lettering, dark pants, and brown work boots with no shoelaces. Agents were able to observe Williams as he entered the front passenger's side door of Harper Jr's truck. Harper Jr. was observed handing Williams's two white boxes with red edges, believed to be vape pens that were discussed in previous sessions. Williams examined the boxes and placed them on the dash of the truck. Williams then handed Harper Jr. what appeared to be a knotted plastic baggy with an unknown white substance inside of one of the corners. Harper Jr took the item, untied the knot, and examined the contents. He put his right index finger inside of the bag and then placed his finger up towards his mouth. Harper Jr. manipulated the contents of the bag, tied a knot in it, and placed it out of view.

62. Based on the combined training, education, experience, and familiarity with this case, your Affiant's believe that the unidentified substance was packaged and manipulated in a manner consistent with powdered cocaine.

63. Curtis Harper Jr. and Williams continued to talk until 12:04 PM when Williams was observed gathering the white and red boxes from his lap as he retrieved an unknown amount of U.S. currency from his pocket. Williams appeared to count the currency and handed a portion of it to Harper Jr. Harper Jr. took the money, folded it, and placed it in/on the center console of his truck. The two remained inside of the vehicle until Williams exited and returned to his vehicle at 12:13 PM.

64. Detective Grbach and Narcotics Agents Sepic and Antonucci were directed to follow Williams in his Ford F-150 as it departed the area. Agents followed Williams to his residence at 522 Howard Street, East Pittsburgh, PA. Williams was observed walking away from the truck and then standing on the front porch of the residence as surveillance units circled the block. At approximately 12:27 PM, Detective Grbach observed Williams walk across the street and enter his grey Ford F-150. Surveillance units followed Williams as he travelled to the Great Valley Shopping Center on Lincoln Highway in North Versailles, PA. While in the shopping center parking lot, Agent Antonucci observed a white male wearing blue jeans and a grey sweatshirt enter the front passenger's side of Williams' truck. The truck circled the parking lot before Detective Grbach observed it stopped in front of a dark grey Ford Taurus bearing PA registration JDB6315, registered to Phillip Hipple. Detective Grbach noted in his surveillance report that he observed the lights of the Taurus illuminate within seconds of Williams' truck pulling away and there were no other vehicles that moved in the vicinity of the parking lot at this time. Believing that a possible narcotics transaction had occurred inside of Williams' truck, Detective Grbach and Agent's Sepic and Antonucci followed the Taurus as it exited the parking lot and traveled on Route 30 towards North Huntingdon Township.



65. On November 16, 2022 at approximately 1259 hours Officer Benick was able to locate PA registration JDB6315 traveling on Clay Pike. A traffic stop was conducted in the parking lot of the Marathon Gas Station located at 1111 Clay Pike, Irwin PA, 15642. Det. Rebel asked Hipple if he had any narcotics inside of his vehicle, to which Hipple admitted that he had a quarter ounce of cocaine in the center console under the radio. Hipple then provided consent to retrieve the narcotics from the vehicle. Hipple was then asked for consent to search the entire vehicle for further narcotics, to which Hipple provided consent. Det. Rebel retrieved a clear baggy containing cocaine from the center console area. A search of the interior of the vehicle yielded no further narcotics.

66. Your Affiant, Agent Seaburn, and Agent Snyder met with Phillip Hipple at North Huntington Police Department and read him his Miranda Warnings. Phillip Hipple stated to your Affiant that he had just bought the 8 grams of cocaine from Ramone Williams at the Green Valley Shopping Center. Hipple advised he purchased the cocaine for \$350 and was purchasing it through Ramone Williams for a friend.

67. Throughout the course of this investigation Agents have intercepted multiple calls between Ramone Williams and Curtis Harper Jr in the manner described above. The contents of these conversations are directly correlated to Curtis Harper Jr's illegal narcotic trafficking organization. During this investigation, when phone calls and / or text messages were intercepted between Curtis Harper Jr and Ramone Williams, surveillance units were deployed to the area. Surveillance units were able to view Ramone Williams going to and from his residence 522 Howard Street, E. Pittsburgh PA while setting up potential illegal narcotic transactions. Meetings between Curtis Harper Jr and Ramone Williams were consistent with a pattern your Affiant has consistently viewed by Curtis Harper Jr when meeting individuals for hand to hand narcotic

transactions. Before meeting Ramone Williams, Curtis Harper Jr would back down a side lower driveway then pull his vehicle to the top driveway which has been consistently viewed by your Affiant. When Ramone Williams met with Curtis Harper Jr at his residence this pattern was also viewed yet again.

68. **ISAIAH WARREN** - Isaiah Warren has been identified as a co-conspirator in Curtis Harper Jr's drug trafficking organization (DTO). During the execution of the incorporated Order authorizing the interception of wire and electronic communications, pertinent communication between Curtis Harper Jr. (Target Telephone 1) and Ramone Williams has been intercepted.

69. On October 28, 2022, at 8:11 am, Curtis Harper Jr. received a text message from telephone number 412-294-2750. The text conversation is as follows:

a. IW: "Goodmorning bro."

70. On October 28, 2022, at 8:12 am, Curtis Harper Jr. placed an outgoing call to 412-294-2750. Curtis Harper Jr. referred to the male he called as "Ike", a known nickname utilized by Isaiah Warren. The phone conversation is as follows:

- a. IW: good morning my brotha
- b. CH: whats up Ike
- c. IW: how you doin you asleep?
- d. CH: yea was knocked out man
- e. IW: oh my fault my fault my fault yea I am about to pull into work
- f. CH: yea whats up?
- g. IW: yea I was thinking about keeping the car right
- h. CH: right

- i. IW: I just might not be able to get it washed fast enough but you know what I mean I can get it washed
- j. CH: alright thats cool
- k. IW: if that's cool with you
- l. CH: yea but
- m. IW: UI SL give you that one
- n. CH: what they say though what did they say man?
- o. IW: Umm they burnt right
- p. CH – because because that the same one as the last one you got the wet one
- q. IW – I know but they they they cried but you know, you know what im saying that's wha
- r. CH – yea I got I got I got some new car anyway I got a new car anyway so
- s. IW – you know what I mean so you know what I mean like they they, went to the aaa they went to go eat and shit and wen to go aaa cook an then
- t. CH – I got I got I got something for them yo I got a new car for em
- u. IW – aaaa ok ok ok well umm alright I mean you know what I mean this
- v. CH – alright how how ever you want to do it you know what I mean that second one that second one is from the new one to
- w. IW – aaaa ok ok yea cause I ain't even you know
- x. CH – yea but just wait just wait till next time and I got something for them
- y. IW – alright aight I rap to you
- z. CH – aight
- aa. IW – like I say just you know give sec aight

- bb. CH – ok I got you
- cc. IW – but we cool we good though aight
- dd. CH – yea im going back to...
- ee. IW – just give me give me a sec
- ff. CH – yea yea I got to get up early with these dam dogs man at 5:30 man and I  
went back to sleep man
- gg. IW – “laughing” aight im on my way to work man Ima got off, got off late last  
night and up again and at it man these two jobs is killing me
- hh. CH – right shit you got to get that money shit
- ii. IW – you better know it
- jj. CH – get that money right
- kk. IW – aight big aight big bro just a little bit a patience that’s all aight
- ll. CH – aight I no problem man
- mm. IW – aight

71. On November 11, 2022, at 1629 hours, Curtis Harper Jr. called 412-294-2750. The conversation is as follows:

- a. IW: What’ s up hot?
- b. CH: Discussin SL bitches bro, (mumbling) you coming today?
- c. IW: Ok uhm yea I’ m getting my son together, I’ ll be over like around 5-5:30
- d. CH: ok, alright cool
- e. IW: alright

72. On November 11, 2022, at 1906 hours, Curtis Harper Jr. texted 412-294-2750. The text conversation is as follows:

- a. CH: "Leaving for the movies at 8"
- b. IW: "Sorry bro my ass was knocked out. Call you in the am"

73. On November 12, 2022, at 0659 hours, Curtis Harper Jr. texted 412-294-2750. The text conversation is as follows:

- a. CH: "thumbs up emoji, square symbol"

74. On November 14, 2022, at 0950 hours, Curtis Harper Jr. called 412-294-2750 (positively identified by agents as Isaiah Warren through physical ID). The conversation is as follows:

- a. IW: Hey whats up big player
- b. CH: Whats up Ike Whats goin on ma
- c. IW: UI I missed you on Friday bro Umm As soon as I get done with this job this job in a couple hours you gonna be around
- d. CH: yea just hit me hit me let me know you on your way or something
- e. IW: Alright I will
- f. CH: Alright Cool
- g. IW: Alright

75. On November 14, 2022, at 12:52 pm, Curtis Harper Jr. received an incoming call from 412-294-2750. The conversation is as follows:

- a. CH: UI/ What up Ike?
- b. IW: Hey Br, Shit I am probably
- c. CH: Yo.
- d. IW: I am probably like five minutes.
- e. CH: Alright I am here. IW- Alright Cool.
- f. CH: Alright, bye.
- g. IW: Bye.

76. After the above call, agents monitoring electronic video surveillance of Harper Jr's residence observed Harper Jr inside of his truck on Porter Street, adjacent to his upper driveway. At approximately 12:56 PM, Harper Jr. backed his truck to the lower driveway of his residence. At approximately 1:04 PM, Warren arrived in his white GMC Terrain bearing PA registration LLR1226, determined to be registered to Isaiah Warren, 246 Mansion St., Pittsburgh, PA 15207, on a 2017 GMC. Warren exited his vehicle and entered the front passenger's side of Harper Jr's truck. He remained inside of the truck for less than five minutes before exiting and returning to his vehicle. Based upon the evidence developed during the course of this investigation and information gathered during the course of the investigation and the training and experience of our Affiant, it is averred that the above conversation and subsequent actions were consistent with a narcotics transaction between Harper Jr. and Warren. Physical surveillance units maintained a constant visual observation of Warren and his vehicle until 1:15 PM when a traffic stop was conducted when it was learned that Isaiah Warren was driving with a suspended driver's license. During the

course of surveillance, Warren did not stop at any locations and/or meet with any individuals until he was pulled over by law enforcement. A consent search and subsequent search warrant resulted in the seizure of approximately 4 ounces (112 grams) of cocaine from Isaiah Warren's vehicle.

77. At approximately 1:28 pm, Detective Summers read Isaiah Warren his Miranda Rights. Subsequently, your Affiant interviewed Isaiah Warren at the White Oak Police Department. Warren indicated he had just left 3401 O'Neil Blvd., McKeesport, PA, and had met with Curtis Harper Jr. Isaiah Warren stated that it was at that time he bought the four (4) ounces of cocaine from Curtis Harper Jr. Isaiah Warren advised your Affiant that he has been meeting with Curtis Harper Jr for approximately 2-3 months and that he has been buying approximately 3-4 ounces of cocaine from Harper Jr every 3-4 weeks during this time period. Isaiah Warren confirmed his cellular telephone number to be 412-294-2750.

## **POOL SELLING AND BOOKMAKING**

78. The driving force behind an illicit bookmaking operation is making money. Financial gain is the ultimate goal of any bookmaking/sports betting operation. The operators/bookmakers generally earn significant amounts of tax free dollars with little risk and low overhead. A "bookmaker" is an overseer or manager of an illegal sports betting operation.

79. Bookmakers maintain records of wins, loses, and wagers placed by bettors. These records are referred to as "the book." The book consists of "tally sheets" which record any sports wagers placed by bettors. Many bookmakers, in an effort to evade law enforcement, utilize illegal off-shore sports betting websites to maintain tally sheets and other gambling records. These websites can be used independently, or to supplement a book that is physically recorded and maintained by the bookmaker. An Administrative Agent is a bookmaker with administrative

permissions, or rights, through the off-shore sports betting websites. The terms Administrative Agent and bookmaker are used synonymously throughout this affidavit.

80. The sports betting websites typically store their information on computer servers located outside the United States. In illegal sports betting operations, an “agent” is a person who acts on behalf of the bookmaker to assist or manage groups of bettors. A “bettor” is the individual placing monetary wagers on sporting events, usually based upon betting lines and point spreads. After a bettor obtains a personal log-on for the illegal off-shore betting website from a bookmaker, the bettor can place a wager either through the website or through a “1-800” toll-free telephone facility number associated with the website. A log-on consists of a personal username and password to allow each individual bettor access to the illegal off-shore betting website. To obtain the log-on, the bookmaker, or Administrative Agent contacts the operators of the illegal off-shore betting website via a 1-800 toll-free telephone facility number. The bookmaker then provides the log-on to the bettor. The bettor collects their winnings or pays any losses by interacting with a bookmaker/agent/runner. The money transactions where wins and losses are resolved and paid are referred to as a “settle-up.” Typically, the bookmaker/agent/runner will settle-up with individual bettors at a previously agreed upon day and location.

81. Communications intercepted pursuant to the aforementioned Order and the contents obtained through the execution of a sealed search warrant for Harper Jr’s iCloud account confirmed he utilizes a website called *Action247.ag* to manage his illegal sportsbook. Harper Jr’s customers are issued a unique user name/ID and a password to log into *Action247.ag* to place their bets. Each user is issued a line of credit from \$200 to \$20,000, depending on their betting history and reliability. Although the bets are placed though the website, Harper Jr. is still required to collect his customer’s debts or pay them their winnings in person, also known as a “settle up”.



82. According to Special Agent Mike Mihalko of the Pennsylvania Office of Attorney General, Computer Forensics Unit, the Internet Protocol (IP) address for <http://www.action247.ag> is 201.237.192.227. An open source query revealed that there were at least twelve (12) domains hosted by this IP address. Those include: *action247.ag*, *8855.ag*, *bostonbets.ag*, *betosb.com*, *vegasbets777.ag*, *play365.ag*, *betbig247.com*, *firstclasswager.com*, *bestplay.ag*, *vegasplayhouse.ag*, *funcity.ag*, and *99wager.com*. A query of the American Registry for Internet Numbers (ARIN) revealed that the registrant for this IP address is based in San Jose, Costa Rica. (Costa Rica is notorious for hosting “off-shore” illegal gambling services and sportsbook operations because of their lack of government oversight and liberal attitude to online gambling operators.) Your Affiant, Agent Hindinger, knows from training, experience, and conversations with other investigators that bookmakers who manage illegal gambling operations in the United States will often use websites hosted in Costa Rica to thwart law enforcement detection.

83. Based on your Affiant’s combined training and experience, and what we have learned during this investigation, the gambling operation works as follows: Administrative Agents are provided an access code and a password for access to their “book” (a book is a group of individuals placing wagers under a specific bookmaker). The Administrative Agent controls the issuing of access codes and passwords to individual bettors and agents under his book. Individuals approved as agents are also provided an access code and a password for their “book,” in order to manage the agent’s bettors.

84. The facts supporting our belief that Curtis Harper Jr. is involved in an illegal sports betting operation, and that he uses the captioned website to control his book, are as follows:

85. Agents have intercepted multiple phone calls between Harper Jr and a male who whose identity is known to your Affiant but shall be referred to as DS. During these phone calls,

Harper Jr. requested DS to “reset SLU210”. It is believed that DS is an Administrative Agent for the *Action247.ag* website which would give him the ability to reset the credit limit for a user after they have settled their debts. These phone calls coincide with text messages or phone calls between Harper Jr. and another male identified as Robert Green. On one occasion, Robert Green called Harper Jr. and told him that he couldn’t remember the website. Harper Jr. followed up the phone call with a text message that included the hyperlink for <https://engine.action247.ag/wager/Sports.aspx>. Your Affiants have learned through intercepted communications that Robert Green lost over \$40,000.00 since October 27, 2022. Green is just one of several customers that Harper Jr. has collected money from or paid since the start of intercepted communications.

86. Harper Jr. has contacted DS several times at phone number 724-217-2880 to reset account SLU210 since the interception of wire and electronic communication commenced; most recently on November 20, 2022 and again on November 22, 2022. Prior to each of these requests, Robert Green has messaged Harper Jr. to “reset” him. On one occasion, Green asked Harper Jr. to reset him and inferred that he would have his money for him when he got off work that day.

87. **iCloud Search Warrant:** On November 26, 2022, Your Affiants applied for a search warrant for the iCloud account information associated with Curtis Harper Jr. The warrant was approved and signed by Judge Mary Jane Bowes of the Superior Court of Pennsylvania. The search warrant response from Apple contained notes with eleven user ID’s and associated passwords consistent with the *Action247.ag* verbiage and terminology intercepted between Curtis Harper Jr, Robert Green, and DS.

88. The following user names and passwords were recorded from the aforementioned iCloud notes: **205 ac; 206 ab; 207 jb; 208 tb/jharp; 209 bh/lke; 210 jh/rob; 211 bd/bill; 212 ch/tim; 213 dr; 214 cr; 215 bl.**

89. Furthermore, the iCloud search warrant response also included several screenshots taken from “*engine.action247.ag*.” These screenshots identified the “Player” with an associated “SLU”, specifically and sequentially SLU205 through SLU215. Each screenshot showed the users balance, available credit, and risk (open bets). Several of the screenshots depicted a user’s open bets, a description of the bet, the time and date that it was placed, and the amount the user would win if their bet was successful.

90. **Action 247.ag Accounts:** On Wednesday, December 7, 2022, you Affiant, Agent Hindinger, applied for and was granted a search warrant to access information, records, and data accessible on the website, <https://www.action247.ag>, using the user names and passwords outlined in Para. 88, above. The warrant was approved and signed by the Honorable Judge Kelly Bigley, Allegheny County Court of Common Pleas. Your Affiant executed the warrant on December 8, 2022 between 11:06 AM and 11:47 AM. Your Affiant was able to download and memorialize a transaction history for several of the aforementioned accounts. The accounts reflected weekly wins and losses between September 25, 2022 and the date of execution, December 8, 2022. A tally of wins and losses indicated that Harper Jr’s sports book profited \$115,222.00 during this time period.

91. **Lynette McClinton and Robert Green transaction:** On one specific occasion, November 5, 2022, your Affiants learned from intercepted communication that Green owed Harper Jr. \$16,500.00 from illegal gambling wagers. During a series of associated sessions, Green asked Harper Jr to reset his account and told him that he would bring him “16 in da morning.” Harper Jr. responded, “16k, Plus my 500.00...” On November 6, 2022, Harper directed Green to

bring the money to his “girl” at the door of his house. Agents observed Green arrive at the residence in his silver GMC Yukon where he was met by Harper Jr.’s live-in girlfriend, Lynette McClinton. Your Affiants clearly observed Green hand McClinton a folded stack of U.S. currency. McClinton held onto the money and returned to the inside of her residence through the side door.

92. **Money pick-up:** On November 14, 2022 at 11:25 AM, Curtis Harper Jr. called 724-217-2880, a phone subscribed to and utilized by DS. During this conversation, Harper Jr. told DS that he had a “new address” for him. He then recited the following numbers, “25 257”. DS repeated the numbers back to him, “25 257” and Harper Jr. confirmed them. DS told Harper Jr. that he would get him “taken care of” and the session was terminated.

93. On November 15, 2022 at 7:14 PM, Curtis Harper Jr. received a call from 724-217-2880, a phone subscribed to and utilized by DS. During this conversation DS told Harper Jr. that he, “...just put that information together” and asked if Harper Jr. was close or if he could take a ride. The two agreed that they would wait until early morning on the following day, November 16, 2022 around 10:00 AM.

94. On November 16, 2022, Agents Ron Pate and Abram Cone positioned themselves to conduct surveillance at a previously identified meeting location for Harper Jr. and DS. It should be noted that DS’s vehicle was parked in the handicapped spot where it has been observed on several previous occasions. Physical surveillance units followed Harper Jr. from his residence to the meeting location on this date.

95. Agent Pate entered and observed Harper Jr. park his truck in the fire lane and enter the building through the front door. Harper Jr. was not carrying anything in his hands when he entered. According to Agent Pate, Harper Jr. went into an “Employees Only” section of the building before he exited with a semitransparent, blue plastic shopping bag. Agent Pate reported

that the bag appeared to contain large bundles/stacks of U.S. currency. Agent Pate was able to take photographs of Harper Jr. and the bag as he exited. Harper Jr. entered his truck and departed the area.

96. Physical surveillance followed Harper Jr. to the 1300 block of Centennial Street, McKeesport. At 10:22 AM, Curtis Harper Jr. called 412-654-6802, a phone subscribed to and utilized by Robert Green. During the conversation, Harper Jr. asked Green if he was home and told him that he would be there in four or five minutes. Green stated that he was sitting outside. Surveillance units observed Harper Jr.'s truck stopped at the 1300 block of Centennial Street and observe a black male wearing a grey hooded sweatshirt and a black jacket standing at the passenger's side of Harper Jr.'s truck. Your Affiants know that Robert Green lives at 1309 Centennial Street, McKeesport. Furthermore, your Affiants know from communications intercepted pursuant to the aforementioned Order that Rob Green was up \$12,000.00 during the week of November 7, 2022 thru November 13, 2022. This is also supported by the financial transaction histories obtained from *Action247.ag*, outlined in Para. 89 of this affidavit.

97. Based on our combined training, education, experience, and familiarity with this case, your Affiant's aver that this communication and series of actions were indicative of a "settle-up" between Curtis Harper Jr. and Robert Green.

98. **Robert Green:** Communications intercepted pursuant to the aforementioned Order revealed that Robert Green utilized the account SLU210 to place and manage his illegal sports bets. There were a total of \$102,079.00 in wagers placed through this account between September 25, 2022 and December 8, 2022. Of this \$102,079.00, Green lost \$51,061.00 to Harper Jr.'s illegal sports book.

99. **Christopher Robinson:** An examination of Curtis Harper Jr's iPhone revealed 282 sessions of text message communication between Harper Jr. and Christopher Robinson, phone number 412-401-4367. This phone number was recorded in Harper Jr's cell phone contact list as "Chris Rob." Each of these sessions contained communication consistent with Robinson placing sports bets through Harper. In several of the sessions, Harper provided Robinson with the point spreads for sporting events. Robinson would then place his bets and Harper would acknowledge that he received them and/or entered them. Based off of a comparison between the text messages and the historical transactions obtained from the *Action247.ag* account, your Affiant, Agent Hindinger, avers that the SLU214 account was utilized for Christopher Robinson's illegal sports bets. There were a total of \$90,943.00 in wagers placed through this account between September 25, 2022 and December 4, 2022. Of this \$90,943.00, Robinson lost \$50,133.00 to Harper Jr's illegal sports book. It should be noted that there was no betting history available for this account during the period of December 5, 2022 thru December 8, 2022.

100. There were a total of \$26,975.00 in wagers placed through the other associated accounts for Harper Jr's sports book between September 25, 2022 and December 8, 2022. Of this \$26,975.00, these accounts lost \$14,028.00 to Harper Jr's illegal sports book during this period.

101. The total amount of wagers placed through Curtis Harper Jr's illegal sports book between September 25, 2022 and December 8, 2022 was \$219,997.00. Of this \$219,997.00, Harper Jr's illegal sports book profited \$115,222.00 between September 25, 2022 and December 8, 2022 according to the records obtained through Action247.ag along with the information obtained from Curtis Harper Jr's iCloud account and cellular phone.

102. On December 7, 2022 a sealed Search Warrant was signed by the Honorable Judge Bigley for the residence of 3401 O'Neil Blvd McKeesport PA which is owned by Curtis Harper Jr.

103. On December 7, 2022 this Search Warrant was executed on the address of 3401 O'Neil Blvd McKeesport PA. As a result of the search warrant Agents seized the following:

- a. Approximately 1,102.5 Grams of Cocaine (Nik Tested Positive for Cocaine)
- b. Approximately 4 Grams of Marijuana
- c. 117 packets of THC gummies
- d. 61 THC Vape Cartridges
- e. 12 Gauge Shotgun (S/N AB315628M)
- f. Rifle – Ruger 7MM (S/N 782-70992)
- g. \$11,800.00 in United States Currency

104. Curtis Harper Jr's prior convictions, outlined in Para. 12 (a) and (b) of this affidavit prohibit him from possessing a firearm in accordance with Title 18 PA C.S.A. § 6105. The 12 gauge shotgun (S/N AB315628M) was loaded with ammunition upon its discovery. The firearm was located on top of the refrigerator inside of the garage. Your Affiants know that this garage is utilized by Harper Jr. on an almost daily basis to feed, water, and tend to his dogs. Furthermore, this refrigerator was located adjacent to the internal basement door of the residence. Your Affiant's know that Harper Jr. refers to this room as his "Man Cave" and there was also a sign with the words "Man Cave" inside of the room.

105. Additionally, Agents located a Ruger M77 7MM rifle in the closet of the master bedroom. The rifle was located in the left rear corner of the closet. It is worth noting that the left

side of the closet contained men's clothing, jackets, jerseys, and t-shirts that were sized consistently with Curtis Harper Jr.

106. **Curtis Harper Jr. iPhone:** On December 7, 2022, your Affiants applied for and were granted a search warrant for a 2020 GMC Sierra pickup truck belonging to Curtis Harper Jr. The search warrant was approved and signed by the Honorable Judge Kelly Bigley, Allegheny County Court of Common Pleas. During the execution of this warrant, Agents seized a black iPhone belonging to Curtis Harper Jr. The contents of the cellphone were forensically extracted and examined for evidence. During the examination your Affiant, Agent Hindinger, located text messages and photographs consistent with Harper Jr's illegal bookmaking operation being facilitated through <https://www.Action247.ag>. Furthermore, the device contained the user names and saved passwords for the *Action247.ag* accounts outlined in Para. 88 of this affidavit.

### **RELIEF REQUESTED**

107. Based on our combined training, education, experience, and familiarity with this case, you Affiants aver that Curtis Harper Jr. participated and conducted a criminal enterprise engaging in the trafficking of controlled substances and the operation of an illegal sports bookmaking business.

108. Based on our combined training, education, experience, and familiarity with this case, you Affiants aver that Curtis Harper Jr. did possess, with intent to deliver 1,102.5 grams of cocaine in violation of 35 P.S. § 780-113 (a)(30).

109. Based on our combined training, education, experience, and familiarity with this case, you Affiants aver that Curtis Harper Jr. did possess, with intent to deliver marijuana vape pens and edibles in violation of 35 P.S. § 780-113 (a)(30).



110. Additionally, Curtis Harper Jr did distribute cocaine between February 2022 through December 2022.

111. Curtis Harper Jr did illegally possess firearms, namely a Mossberg 12 Gauge Shotgun (S/N AB315628M) and a Ruger 7MM rifle (S/N 782-70992), being a person convicted of an offense enumerated in subsection (b) of Title 18 PA C.S.A. § 6105.

112. Based on our combined training, education, experience, and familiarity with this case, you Affiants aver that Curtis Harper Jr. has engaged in bookmaking, utilizing the website, <https://www.action247.ag> to facilitate his operation. His pattern of behavior, records obtained from the iCloud account associated with [curtisharperfitness@yahoo.com](mailto:curtisharperfitness@yahoo.com), records forensically extracted from his Apple iPhone 8, and communications intercepted pursuant to the aforementioned Order, coupled with physical and electronic surveillance indicate that Harper Jr. is receiving, recording, and forwarding bets and/or wagers contingent upon the result of collegiate and professional sporting events in violation of Title 18 PA C.S.A. § 5514.

113. Furthermore, your Affiants aver that Curtis Harper Jr. conducted financial transactions with the knowledge that the proceeds from his illegal sports book operation were the proceeds of unlawful activities, namely, Title 18 PA C.S.A. § 5514, Pool selling and bookmaking. Specifically, the patterns of behavior outlined in Para. 18 thru Para. 23 of this affidavit, supported by the communications intercepted pursuant to the aforementioned Order, records obtained from Harper Jr's iCloud account and cellphone, and physical and electronic surveillance are consistent with a "bookie" collecting and settling-up debts for an illegal bookmaking operation.

114. Your Affiants also aver that Curtis Harper Jr. utilized a communications facility to facilitate his illegal bookmaking operation as defined by Title 18 PA C.S.A. § 5514, Pool selling and bookmaking and Title 18 PA C.S.A. § 7512, Criminal use of a communication facility.

Specifically, Harper Jr utilized an Apple iPhone 8 and the T-Mobile phone number 412-537-8372 to access and record the website <https://www.action247.ag> for the purpose of managing and recording his illegal sports book. Furthermore, Harper Jr utilized this device and the associated phone number to take bets, coordinate settle-ups, and manage the administrative functions of his illegal sports book. Additionally, Curtis Harper Jr utilized this device to facilitate the delivery and/or possession with intent to distribute cocaine.

115. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief, and that this declaration was executed on the date listed below.



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923059-4	Complaint/Incident Number ASAP-734885/BN5220037
Defendant Name	First: CURTIS	Middle: M	Last: HARPER

I, JOSEPH SEABURN, 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.

JOSEPH SEABURN

(Signature of Affiant)

Sworn to me and subscribed before me this 30 day of

DEC

2022

12/30/2022 Date

, Magisterial District Judge

My commission expires first Monday of January,

2028

CRAIG C. STEPHENS,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-22  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2028

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

MDJ: Hon. EUGENE F RIAZZI  
Magisterial District Number: 05-2-13  
Address: 687 O'NEIL BLVD  
MCKEESPORT, PA 15132

DEFENDANT: (NAME and ADDRESS):  
EARL MCCLINTON  
First Name Middle Name Last Name Gen.  
2807 FREELAND ST MCKEESPORT, PA 15132

Phone: 412.664.4612

NCIC Extradition Code Type

Felony - Full Extradition

Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number ER-15-23	Date Filed 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-736260/BN5220037	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 08/27/1992	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.) 180
FBI Number	MNU Number		FT HEIGHT in. 6 02	
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.
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, JOSEPH SEABURN (Name of the Affiant)	300271 (PSP/MPOETC -Assigned Affiant ID Number & Badge #
of ATTORNEY GENERAL (Identify Department or Agency Represented and Political Subdivision)	PA0222400 (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above I accuse the defendant whose name is unknown to me but who is described as _____	
I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have, therefore, designated as John Doe or Jane Doe	
with violating the penal laws of the Commonwealth of Pennsylvania at _____ (Subdivision Code) MCKEESPORT CITY (Place-Political Subdivision)	
In Allegheny County	02 (County Code)
on or about 11/02/2022	18:17

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735250/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

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	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, TRAFFICKING COCAINE in violation of 18 Pa. C.S. §911(b)(3).									

<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	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 CURTIS HARPER 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).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735250/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

<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					
Lead?	Offense# 3	Section 7512	Subsection A	of the 18	Counts 1	Grade 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, USED CELL PHONE FOR SALE OF COCAINE, in violation of 18 Pa.C.S. § 7512.								

<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					
Lead?	Offense# 4	Section 903	Subsection (A)(1)	of the 18	Counts 1	Grade 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 CURTIS HARPER 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).								

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735250/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

<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						
Lead?	5	780-113	A30	of the	35	1	F		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (If applicable)		Accident Number				<input type="checkbox"/> 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 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, possessed with intent to deliver a controlled substance, namely, COCAINE, in violation of 35 P.S. §780-113(a) (30).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-8	Complaint/Incident Number ASAP-735250/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

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.)

01/04/2023

(Date)

/JOSEPH SEABURN/  
(Signature of Affiant)

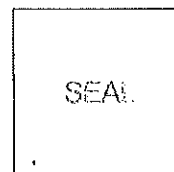
831

AND NOW, on this date 1-4-23 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.

05-2-13  
(Magisterial District Court Number)

E. Riazzi  
(Issuing Authority)



EUGENE F. RIAZZI, JR.,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-13  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2026

ORIGINAL





# POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735250/BN6220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

## AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

a) Date when Affiant received information:

11/2/2022

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

11/2/2022

2. HOW:

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

AGENT OBSERVATIONS, COOPERATING EVIDENCE

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

AGENT OBSERVATIONS, COOPERATING EVIDENCE

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

AGENT OBSERVATIONS, COOPERATING EVIDENCE

3. WHAT CRIMES:

18 7512 A CRIMINAL USE OF COMMUNICATION FACILITY

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

18 911 B3 CORRUPT ORGANIZATION

18 911 B4 CORRUPT ORGANIZATION

18 903 (A)(1) CRIMINAL CONSPIRACY

4. WHERE CRIME(S) COMMITTED:

MCKEESPORT, 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

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735250/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

Your Affiant, Narcotics Agent Joseph Seaburn being duly sworn according to law, avers that the following is true and correct to the best of his knowledge, information and belief and is based on personal knowledge or information provided by reliable sources:

Your Affiant, Joseph E. Seaburn, a Narcotics Agent II is 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 December of 2016. Your affiant, from December 2016 to December 2017 was employed by the New Castle Police Department as well as the Mercer Borough Police Department. From December 2017 to May 2021 your affiant was employed by the Pittsburgh Bureau of Police. Since May of 2021, your Affiant has been employed with the Pennsylvania Office of Attorney General in the Bureau of Narcotics Investigation and Drug Control. Your Affiant is currently assigned to the North Huntingdon Office, Narcotics Division. As a Narcotics Agent of the Pennsylvania Office of the 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 offense under the Pennsylvania Crimes Code.

Your Affiant, while employed as a Narcotics Agent II, Pittsburgh Police Officer, New Castle Police Officer and Mercer Borough Police Officer, has been involved in numerous investigations concerning narcotics violations and of the Controlled Substance, Drug, Device and Cosmetic Act. While employed at the city of Pittsburgh Police, your Affiant worked as a Patrol Officer as well as a Plain Clothes Detective. During your Affiant's career as a Pittsburgh Police Officer, your Affiant had been involved in hundreds of arrests and convictions. Specifically, your Affiant has made numerous arrests for violations of the Drug Device and Cosmetic Act, resulting in numerous convictions for these offenses.

Your Affiant has applied for, obtained and executed search warrants, as well as made seizures of narcotics, firearms and other materials involved in the packaging and distribution of narcotics. Your Affiant has been involved in numerous undercover purchases of controlled substances. Your Affiant has extensively interviewed dozens of individuals involved in selling or using of illegal narcotics. These individuals have provided your Affiant with detailed information concerning the terminology of the sale of narcotics, how illegal narcotics are sold, manufactured, cultivated and used. Your Affiant has attended numerous trainings and academies as a Police Officer and Narcotics Agent.

As a result of his training and experience, your Affiant has extensive knowledge regarding illegal drugs and the business of illegal drug sales, as well as the methods utilized by drug traffickers in the sale and distribution of controlled substances. This includes, but is not limited to, the tactics and methods of communication, including the fact that drug users and traffickers often speak in "code" when discussing drugs and drug transactions, and other methods employed by illegal drug traffickers in furtherance of their criminal conduct and in an effort to avoid law enforcement detection.

In November 2021, I completed the Class "A" Pennsylvania State Police Wiretapping and Electronic Surveillance Training School as mandated in Title 18 Pa. C.S. § 5724 and received Class "A" certification Number A-6408. I have participated in non-consensual electronic surveillance investigations with the Pennsylvania Office of the Attorney General; Bureau of Narcotics Investigation and Drug Control.

Affiant Seaburn 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 of April 14, 1972, P.L. 233, No. 64, Section 1, et seq., and related offenses under the Pennsylvania Crimes Code.

Earl McClinton (412-956-3245) is the son of Curtis Harper Jr's live in girlfriend Lynette McClinton.

On October 27, 2022, an Order (Misc. No. 12-08 W.D. 2022) authorizing the interception of wire and electronic communication of Curtis Harper Jr, Target Telephone 1 (412-537-8372) was signed by the Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania. On November 26, 2022 an extension order authorizing the extension of the interception of wire and electronic communication of Curtis Harper Jr, 412-537-8372 was signed by Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania.

During the execution of the incorporated Order authorizing the interception of wire and electronic communications, pertinent communication between Curtis Harper Jr. (Target Telephone 1) and Earl McClinton (412) 956-3245 has been intercepted.

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735250/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

On November 2, 2022 at 6:17 PM, Curtis Harper Jr received a phone call from Earl McClinton. A transcript of this conversation is as follows:

CH: Curtis Harper Jr

EM: Earl McClinton

EM: "Half."

CH: "Yup, how long?"

EM: "I'm leaving North Versailles."

CH: "Ok."

EM: "Alright."

After the call was placed, physical surveillance was deployed and an interdiction was ordered at the direction of your affiant, Agent Seaburn. At 6:23 PM, electronic surveillance observed Curtis Harper Jr. pull into his residence driving his registered red GMC Sierra pickup truck bearing Pennsylvania registration plate ZPX8492. At 6:33 PM, electronic surveillance observed a reddish/maroon Buick Lacrosse bearing Pennsylvania registration LSA7801 arrive at Curtis Harper Jr's residence (3401 O'Neil Blvd. McKeesport, PA 15132). Agents who were monitoring the electronic video surveillance camera observed a male, positively identified as Earl McClinton, approach the open driver side door of Curtis Harper Jr.'s truck. It appeared that the two engaged in brief conversation before Agents observed an interaction consistent with a drug transaction. Earl McClinton departed the residence in his Buick Lacrosse

At 6:37 PM, McKeesport Officer. C. Thomas and TFO S. Summers conducted a traffic stop on Earl McClinton's vehicle in the front of 2807 Freeland Street for an equipment violation. TFO S. Summers recovered a knotted plastic bag containing thirteen (13) grams of suspected cocaine inside of McClinton's front right pants pocket. The evidence was NIK tested by your affiant, Agent Seaburn, and produced a positive response for the presence of cocaine.

McClinton was transported to the McKeesport Police Department and released after being advised he would receive his charges via summons in the mail.

Following his release, McClinton placed a phone call to Curtis Harper Jr. at 8:42 PM. During the conversation, McClinton told Harper Jr. that he was stopped by the police after leaving his house. Harper Jr. asked McClinton if he was stopped by undercover police. McClinton told Harper Jr. that he was stopped by "regular cops" and they "took my shit." Harper Jr. asked if they caught him with the "pop-pop" and then tells him at least he is going to get a summons and not a charge. Curtis Harper Jr then directed McClinton to make sure that he didn't have any weed or anything else in his yard then immediately rephrased and stated, "I mean house". McClinton told Harper, "Yeah, I feel you, I feel you bro, like I said them niggas ain't dancing on me anyway, with that little ass bit of white."

The rest of their conversation is transcribed as follows:

CH: Curtis Harper Jr

EM: Earl McClinton

EM: "But, umm, damn, I might uh, I still need you to (unintelligible)."

CH: "Uh, alright, I, I got this, I got the whole one, so I don't got the what's its name, just come get the whole one then."

EM: "Alright, give me a minute, I just got to the crib."

CH: "Alright, just text when you're on your way, like just say I'm on my way."

EM: "Alright."

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735250/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

At 9:28 PM on this same evening Curtis Harper Jr. received a phone call from Earl McClinton. The conversation was transcribed as follows:

CH: Curtis Harper Jr

EM: Earl McClinton

CH: "Yo."

EM: "Yo, yeah, I'm about to leave Christy Park, where'd you want to meet me at?"

CH: "Down here."

EM: "Alright, I'll be there."

After the call was placed, electronic surveillance observed Curtis Harper Jr. inside of his GMC Truck at his residence. Curtis Harper Jr backed his vehicle to the lower side driveway of the residence then returned to the upper driveway of the residence prior to meeting Earl McClinton which is consistent with Curtis Harper Jr's pattern. Throughout the investigation Agents have viewed Curtis Harper Jr back his vehicle to the lower side driveway of his residence prior to conducting suspected narcotic transactions. At 9:37 PM, Earl McClinton pulled behind Curtis Harper Jr., exited his vehicle and got inside the passenger side seat of Curtis Harper Jr.'s truck. At 9:41 PM, Earl McClinton exited the truck and got back into his Buick. Earl McClinton drove away from the residence and Harper Jr. followed him home to 2807 Freeland Street McKeesport PA.

Based upon your affiants, education, training, experience, knowledge of this investigation and information gathered during the course of the investigation, it is averred that the above conversation and actions are consistent with Curtis Harper Jr resupplying Earl McClinton with cocaine to replace what was seized by Agents and McKeesport Police during the traffic stop.

On November 11, 2022, a series of communications were intercepted which revealed that McClinton was acting as a middle-man/broker for another individual, subsequently identified as Tanner Yeager, conducting a drug transaction with Harper Jr.

On November 11, 2022 at 5:18 PM, Curtis Harper Jr (Target Telephone 1) was called by phone number 412-956-3245, a phone subscribed to and used by Earl McClinton. During the conversation, McClinton asked Curtis Harper Jr if he still wanted "them"; and told Harper Jr. that he would call the other individual back and tell that individual to bring "them." Harper Jr. called McClinton back at 7:18 PM to ask if he came yet. McClinton told Harper Jr. that they wouldn't be by until later. Harper Jr. told McClinton that he needs "them" so he can get rid of "them" and that he isn't buying "them" just to sit on "them". During subsequent sessions, Harper Jr. directed McClinton to come to his house.

On November 11, 2022 Agents set up physical surveillance on Earl McClinton at 2807 Freeland Street McKeesport PA. Agents viewed a vehicle (PA LFS0185) arrive at this residence. Agents viewed Earl McClinton exit the stated residence and walk directly to the vehicle and get in the front passenger seat. Agents then followed the stated vehicle directly to 3401 O'Neil Blvd McKeesport PA. At 8:26 PM, Curtis Harper Jr. (Target Telephone 1) received a text message from 412-956-3245, a phone subscribed to and used by Earl McClinton. The message said, "Pulling up". During session 20921, Curtis Harper Jr. (Target Telephone 1) received a phone call from 412-956-3245. The call was transcribed as follows:

CH: Curtis Harper Jr

EM: Earl McClinton

EM Alright let me run back in there

CH Yo

EM Yea you gave me too much

CH Ohh I did, I gave you about three thousand

ORIGINAL



## POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735250/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

EM Yea, I'm at the door

CH Yea, I gave you, yea, I gave you three, open that door for 'em

CH (background noise: give him that much)

On November 11, 2022, physical surveillance units observed a Chevrolet sedan bearing PA registration LFS0185 arrive at the residence of Earl McClinton (2807 Freeland Street McKeesport PA). Agents viewed Earl McClinton get into the front passenger seat of this vehicle at which time his vehicle pulled away from the residence. Agents viewed the stated vehicle travel directly from Freeland Street to the residence of Curtis Harper Jr (3401 O'Neil Blvd McKeesport PA). Agents viewed Earl McClinton exit the stated vehicle and enter Harper Jr's residence where he remained for a few minutes before exiting the residence. McClinton was observed entering the passenger side of the Chevrolet sedan and then again exit the vehicle and return to Harper Jr's residence and shortly thereafter returned to the vehicle. This interaction was consistent with a previous narcotics transaction between McClinton and Harper Jr. Earl McClinton returned to the vehicle he arrived in and traveled directly back to his residence (2807 Freeland Street McKeesport PA) where he exited and went directly inside his residence.

At 9:02 PM, after the operator dropped McClinton off at his residence, TFO S. Summers conducted a traffic stop on the aforementioned Chevrolet sedan for an equipment and vehicle code violation. TFO Summers identified the driver as Tanner Yeager. A criminal history check of Yeager revealed he had prior federal convictions for drug offenses. During the traffic stop, TFO Summers recovered four and a half bundles (approx. 45 stamp bags) of suspected heroin / fentanyl and a plastic baggy containing suspected heroin / fentanyl (approx. 7.5 grams). The drugs were field tested with a positive results for fentanyl.

Tanner Yeager was transported to the McKeesport Police Department where he was read his Miranda Warnings. Agent Seaburn and Detective Summers then interviewed Tanner Yeager. Tanner Yeager stated to your affiant that he was in possession of one hundred (100) THC Weed pens. Through his relationship with Earl McClinton, Yeager stated Earl McClinton knew an individual who was interested in buying all one hundred (100) THC Weed pens for \$15 per pen. This information was validated due to Tanner Yeager having \$1,500 on his person at the time of the arrest. Tanner Yeager admitted to your affiant that he drove to 2807 Freeland Street McKeesport PA to pick up Earl McClinton. At this time Earl McClinton directed Tanner Yeager to 3401 O'Neil Blvd McKeesport PA. This was verified through surveillance. Tanner Yeager stated that he did not know who Earl McClinton was meeting with and that he only knew the individual was buying the THC Weed pens.

On December 4, 2022 at 6:26PM, Curtis Harper Jr (Target Telephone 1) was called by phone number 412-956-3245, a phone subscribed to and used by Earl McClinton. During the conversation Earl McClinton stated, "All right I'm um ah alright I'm goin come get it in like 15 minutes U/I that cool". In subsequent sessions following this Earl McClinton continued to tell Curtis Harper Jr that he was on his way and that he was also arriving at his residence. Surveillance units viewed Curtis Harper Jr back his truck to the lower side lot of the residence then pull his truck back to the front top driveway of the residence. Surveillance units then viewed Earl McClinton arrive at Curtis Harper Jr's residence (3401 O'Neil Blvd McKeesport PA). Agents viewed Earl McClinton go directly to the driver's side door of the residence where Agents positively identified Curtis Harper Jr in the driver's seat of his vehicle. Earl McClinton met with Curtis Harper Jr for only a few seconds which through your affiants training, experience, and knowledge of the case is consistent with a hand to hand narcotic transaction.

Throughout the course of this investigation Agents have intercepted multiple calls between Earl McClinton and Curtis Harper Jr in the manner described above. The contents of these conversations are directly correlated to Curtis Harper Jr's illegal narcotic trafficking organization. During this investigation, when phone calls and / or text messages were intercepted between Curtis Harper Jr and Earl McClinton, surveillance units were deployed to the area. Meetings between Curtis Harper Jr and Earl McClinton were consistent with a pattern your affiant has consistently viewed by Curtis Harper Jr when meeting individuals for hand to hand narcotic transactions. Before meeting Earl McClinton, Curtis Harper Jr would back down a side lower driveway then pull his vehicle to the top driveway which has been consistently viewed by your affiant. When Earl McClinton met with Curtis Harper Jr at his

ORIGINAL



## POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735260/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

residence this pattern was also viewed yet again. From there surveillance units followed Earl McClinton directly back to his residence 2807 Freeland Street McKeesport PA. On another occasion, surveillance units followed Earl McClinton from his residence 2807 Freeland Street McKeesport PA with a corroborating witness directly to Curtis Harper Jr's residence (3401 O'Neil Blvd McKeesport PA). The corroborating witness drove Earl McClinton directly back to his residence 2807 Freeland Street McKeesport PA. Subsequently, a traffic stop was conducted on the corroborating witness in which Agents seized fentanyl and crack cocaine. The corroborating witness stated to your affiant that he /she had just middle a narcotics transaction. This statement was supported by the amount of U.S Currency the corroborating witness had on his / her person.

On December 5, 2022 Agents from the Office of the Attorney General in conjunction with DANET Detectives conducted a trash pull on the residence of 2807 Freeland Street McKeesport, PA 15132. As a result of this trash pull Agents and Detectives recovered indicia with the name Earl McClinton to the address of 2807 Freeland Street McKeesport, PA. Namely a FedEx package and a Huntington Bank Mobile Banking statement. Agents and Detectives also recovered a vacuum sealed baggie which contained loose marijuana stems and seeds. Through your affiants training and experience with marijuana it is known that vacuum sealed baggies are used to package marijuana for sale to keep marijuana dry and fresh by not letting any outside air come in contact with the marijuana. Agents and Detectives also recovered a black firearm tool used to clean the barrel of firearms along with foam ear plugs. All items recovered were found in the same bag together.

On Wednesday December 07, 2022, Agents with the Pennsylvania Office of Attorney General executed a sealed search warrant at 2807 Freeland Street, McKeesport PA 15132. The target of this investigation was, Earl McClinton.

Agents approached the front of the residence and began to knock and announce, "Police, Search Warrant!" several times. After waiting a reasonable amount of time, entry was made into the residence through the front door.

As Agents began to clear the residence, McClinton appeared at the top of the stairwell leading to the upstairs bedrooms. McClinton hesitated to exit his bedroom but eventually complied with Agent's orders. McClinton was detained without further incident.

After the residence was cleared and secure, a thorough and systematic search was conducted resulting in the following seizures. Living Room:

1. Digital scale (Tranter)
2. Indicia for Earl McClinton (Tranter)
3. Duquesne Light Bill addressed to McClinton (Ferris)

McClinton's Bedroom:

1. Black bag with white powdery substance (Truesdell)
2. Baggies & Scale (Barna)
3. \$2,280 US Currency (Barna)
4. (2) cell phones belonging to McClinton (Barna)

Kitchen:

1. Smith & Wesson 9mm pistol SER# FBU2328 (Kabler)

Residence:

1. (2) Kamtron cameras (Barna)
2. (1) LA View camera (Gelles)

On June 29, 2015 Earl McClinton plead guilty to (35780-113A30) manufacturing a controlled substance in which he was sentenced to county probation for a term of 5 years. OTN: G738036-5

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 15-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923397-6	Complaint/Incident Number ASAP-735250/BN5220037
Defendant Name	First: EARL	Middle:	Last: MCCLINTON

On August 4, 2017 Earl McClinton plead guilty to (35780-113A16) possession of a controlled substance in which he was sentenced to county probation for a term of 1 year. OTN: G784632-2

On October 10, 2017 Earl McClinton plead guilty to (35780-113A30) manufacturing a controlled substance in which he was sentenced to a punishment controlled program for a term of 3 years. OTN: G789859-0

As a result of Earl McClinton pleading guilty to these charges on these occasion, he is a person not to possess a firearm.

Due to the large amount of cocaine, US Currency, scales, and baggies seized, and no user paraphernalia located; I aver that probable causes exists to charge McClinton with Possession with the Intent to Deliver.

I, JOSEPH SEABURN, 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.

/JOSEPH SEABURN/

(Signature of Affiant)

Sworn to me and subscribed before me this 4 day of January, 2023

Date

Magisterial District Judge

My commission expires first Monday of January,

SEAL

EUGENE F. RIAZZI, JR.  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-13  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2026

ORIGINAL

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY

MDJ: Hon. EUGENE F RIAZZI  
Magisterial District Number: 05-2-13  
Address: 687 O'NEIL BLVD  
MCKEESPORT, PA 15132

Phone: 412.664.4612



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:

(NAME and ADDRESS):

ISAIAH

WARREN

First Name

Middle Name

Last Name

Gen.

246 MANSION STREET PITTSBURGH, PA 15207

NCIC Extradition Code Type

Felony - Limited Extradition

Distance:

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <b>CR-14-23</b>	Date Filed <b>1-4-23</b>	OTN/LiveScan Number <b>G 923401-3</b>	Complaint/Incident Number <b>ASAP-735246/BN5220037</b>	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 06/05/1969	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>
RACE BLACK	First Name		Middle Name	Last Name
ETHNICITY	AKA			
HAIR COLOR BLK (BLACK)		EYE COLOR BRO (BROWN)		
DNA	DNA Location			WEIGHT (lbs.)
FBI Number	MNU Number			200
Defendant Fingerprinted				5 09
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, JOSEPH SEABURN

(Name of the Affiant)

300271

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

of ATTORNEY GENERAL

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

with violating the penal laws of the Commonwealth of Pennsylvania at 304 MCKEESPORT CITY  
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County

02  
(County Code)

on or about 10/28/2022 12:00

ORIGINAL





# POLICE CRIMINAL COMPLAINT

Docket Number: 14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP-735245/BN5220037
Defendant Name	First: ISIAAH	Middle:	Last: WARREN

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	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, during the time period on or between 10/28/22 and 11/14/22, the actor was involved, directly or indirectly, with trafficking cocaine in Allegheny County, Pennsylvania in violation of 18 Pa. C.S. §911(b)(3).									

<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	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 Curtis Harper 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).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP-735245/BN5220037
Defendant Name	First: ISAIAH	Middle:	Last: WARREN

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)	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 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, Trafficking Cocaine, in violation of 18 Pa.C.S. § 7512.									

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)	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:									
18 903(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 Curtis Harper 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).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP-735245/BN5220037
Defendant Name	First: ISALAH	Middle:	Last: WARREN

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	1	F	NCIC Offense Code	UCR/NIBRS Code
PerinDOT 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:									
35 780-113A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV F 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, 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?	6	780-113	A16	of the	35	1	M	NCIC Offense Code	UCR/NIBRS Code
PerinDOT 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:									
35 780-113A16 PROHIBITED ACTS - POSSESSION M 1 COUNT									
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).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP-735245/BN5220037
Defendant Name	First: ISIAH	Middle:	Last: WARREN

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 P.A.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.)

01/04/2023

/JOSEPH SEABURN/  
(Signature of Affiant)

(Date)

AND NOW, on this date 1-4-23 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.

05-2-13  
(Magisterial District Court Number)

E. Riazzi  
(Issuing Authority)

SEAL

EUGENE F. RIAZZI, JR.,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-13  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2026

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP:735245/BN5220037
Defendant Name	First: ISAAH	Middle:	Last: WARREN

## AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:  
10/28/2022
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:  
10/28/2022

2. HOW:

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

3. WHAT CRIMES:

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

4. WHERE CRIME(S) COMMITTED:

MCKEESPORT, 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
- 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

ORIGINAL



## POLICE CRIMINAL COMPLAINT

Docket Number: 14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP-735245/BN5220037
Defendant Name	First: ISAIAH	Middle:	Last: WARREN

Your Affiant, Narcotics Agent Joseph Seaburn, being duly sworn according to law, avers that the following is true and correct to the best of my knowledge, information and belief and is based on personal knowledge or information provided by reliable sources:

Your Affiant, Joseph E. Seaburn, 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 since December 2016. Your Affiant, from December 2016 to December 2017 was employed by the New Castle Police Department as well as the Mercer Borough Police Department. From December 2017 to May 2021 your affiant was employed by the Pittsburgh Bureau of Police. Since May 2021, your affiant has been employed with the Pennsylvania Office of Attorney General in the 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 related to offenses under the Pennsylvania Crimes Code.

Your Affiant, while employed as a Narcotics Agent II, Pittsburgh Police Officer, New Castle Police Officer and Mercer Borough Police Officer, has been involved in numerous investigations concerning narcotics violations and the Controlled Substance, Drug, Device and Cosmetic Act. While employed at the City of Pittsburgh Police, your affiant worked as a patrol officer as well as a plain clothes detective. During your affiant's career as a Pittsburgh Police Officer, your affiant has been involved in hundreds of arrests and convictions. Specifically, your affiant has made numerous arrests for violations of the Drug Device and Cosmetic Act, resulting in numerous convictions for these offenses.

Your Affiant has applied for, obtained and executed search warrants, as well as made seizures of narcotics, firearms and other material involved in the packaging and distribution of narcotics. Your Affiant has been involved in numerous undercover purchases of controlled substances. Your Affiant has extensively interviewed dozens of individuals involved in selling or using illegal narcotics. These individuals have provided your Affiant with detailed information concerning the terminology of the sale of narcotics, how illegal narcotics are sold, manufactured, cultivated and used. Your affiant has attended numerous trainings and academies as a Police Officer and Narcotics Agent.

As a result of this training and experience, your Affiant has extensive knowledge regarding illegal drugs and the business of illegal drug sales, as well as the methods utilized by drug traffickers in the sale and distribution of controlled substances. This includes but is not limited to, the tactics and methods of communication, including the fact that drug users and traffickers often speak in "code" when discussing drugs and drug transactions, and other methods employed by illegal drug traffickers in furtherance of their criminal conduct and in effort to avoid law enforcement detection.

Affiant Seaburn 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 of April 14, 1972, P.L. 233, No. 64, Section 1, et seq., and related offenses under the Pennsylvania Crimes Code.

On October 27, 2022, an Order (Misc. No. 12-08 W.D. 2022) authorizing the interception of wire and electronic communication of Curtis Harper Jr, Target Telephone 1 (412-537-8372) was signed by the Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania. On November 26, 2022, an extension order authorizing the extension of the interception of wire and electronic communication of Curtis Harper Jr, 412-537-8372 was signed by Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania.

Isaiah Warren (412-267-2750) has been identified as a co-conspirator in Curtis Harper Jr's drug trafficking organization (DTO). During the execution of the incorporated Order authorizing the interception of wire and electronic communications, pertinent communication between Curtis Harper Jr (Target Telephone 1) and Isaiah Warren (412-294-2750) has been intercepted. This phone number (412-294-2750) is subscribed to Isaiah Warren. The address this phone is subscribed to is 309 San Juan Drive, McKeesport, PA 15133.

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP-735245/BN5220037
Defendant Name	First: ISAIAH	Middle:	Last: WARREN

The residence of 3401 O'Neil Blvd. McKeesport, PA 15132 and Curtis Harper Jr's 2020 Maroon GMC Sierra PA ZPX-8492 (VIN3GTU9BED3LG190276) have been under electronic and physical surveillance since February 2022. During that time, your affiant has viewed numerous hand to hand transactions, which through my training, experience and knowledge of the case are indicative of illegal narcotic transactions. On these occasions, Curtis Harper Jr was observed exiting his stated residence or arriving at his residence then driving the stated GMC Sierra truck to the lower side driveway near the dog kennel area of the residence. Curtis Harper Jr would then either meet individuals in the lower side driveway or in the front top driveway of his residence located at 3401 O'Neil Blvd. McKeesport, PA, while he remained seated in the driver's seat of his vehicle. Curtis Harper Jr would then either do a hand to hand transaction through the front driver's window of the vehicle or the individual would enter the passenger side seat of the vehicle then exit the vehicle after a short period of time. On multiple occasions, electronic surveillance viewed Curtis Harper Jr counting a large sum of U.S. currency after these meetings. Curtis Harper Jr would remain in his vehicle for a period of time after these meetings before going back into his stated residence.

On October 28, 2022, at 8:11am, Curtis Harper Jr received a text message from telephone number 412-294-2750. The text conversation is as follows:

IW: "Goodmorning bro."

On October 28, 2022, at 8:12 am, Curtis Harper Jr placed an outgoing call to 412-294-2750. Curtis Harper Jr referred to the male he called as "Ike", a known nickname utilized by Isaiah Warren. The phone conversation is as follows:

IW: good morning my brotha  
CH: whats up IKE  
IW: how you doin you asleep?  
CH: yea was knocked out man  
IW: oh my fault my fault my fault yea I am about to pull into work  
CH: yea whats up?  
IW: yea I was thinking about keeping the car right  
CH: right  
IW: I just might not be able to get it washed fast enough but you know what I mean I can get it washed  
CH: alright thats cool  
IW: Uj SL give you that one  
CH: what they say though what did they say man?  
IW: Umm they might burnt right  
CH: because because that the same one as the last one you got the wet one  
IW: I know but they they they cried but you know, you know what im saying that's wha  
CH: yea I got I got I got some new car anyway I got a new car anyway so  
IW: you know what I mean so you know what I mean like they they, went to the aaa they went to go eat and shit and wen to go  
aaa cook an then  
CH: I got I got I got something for them yo I got a new car for them  
IW: aaaa ok ok ok well umm alright I mean you know what I mean this  
CH: alright how how ever you want to do it you know what I mean that second one that second one is from the new one to  
IW: aaaa ok ok yea cause I ain't even you know  
CH: yea but just wait just wait till next time and I got something for them  
IW: alright aight I rap to you  
CH: aight

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: CR -14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP-735245/BN5220037
Defendant Name	First: ISAIAH	Middle:	Last: WARREN

IW: like I say just you know give sec aight  
CH: ok I got you  
IW: but we cool we good though aight  
CH: yea im going back to...  
IW: just give me just give me a sec  
CH: yea yea I got to get up early with these damn dogs man at 5:30 man and I went back to sleep man  
IW: "laughing" aight im on my way to work man lma got off, got off late last night and up again and at it man these two jobs is killing me  
CH: right shit you got to get that money shit  
IW: you better know it  
CH: get that moeny right  
IW: aight big aigh big bro just a little bit a patience that's all aight  
CH: aight I no problem man  
IW: aight

On November 8, 2022 at 0913 hours, Curtis Harper Jr received a text message from telephone number 412-294-2750. The text conversation is as follows:

IW: "GM bro. I'm off Friday. You have any plans"  
CH: "See you Friday"  
IW: "Ok"

On November 11, 2022, at 1629 hours, Curtis Harper Jr called 412-294-2750. The conversation is as follows:

IW: What's up hot?  
CH: Discussin SL bitches bro, (mumbling) you coming today?  
IW: Ok uhm yea I'm getting my son together, I'll be over like around 5-5:30  
CH: ok, alright cool  
IW: Alright

On November 11, 2022, at 1906 hours, Curtis Harper Jr texted 412-294-2750. The text conversation is as follows:

CH: "Leaving for the movies at 8"  
IW: "Sorry bro my ass was knocked out. Call you in the am"

On November 12, 2022, at 0659 hours, Curtis Harper Jr texted 412-294-2750. The text conversation is as follows:

CH: "thumbs up emoji, square symbol"

On November 14, 2022, at 0950 hours, Curtis Harper Jr called 412-294-2750 (positively identified by agents as Isaiah Warren through physical ID). The conversation is as follows:

IW: Hey whats up big player  
CH: Whats up lke Whats goin on ma  
IW: U I missed you on Friday bro Umm As soon as I get done with this job this job in a couple hours you gonna be aaround  
CH: yea just hit me hit me let me know you on your way or something

ORIGINAL





# POLICE CRIMINAL COMPLAINT

Docket Number: 14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP-736245/BN5220037
Defendant Name	First: ISAIAH	Middle:	Last: WARREN

IW: Alright I will  
CH: Alright Cool  
IW: Alright

On November 14, 2022, at 12:52 pm, Curtis Harper Jr received an incoming call from 412-294-2750. The conversation is as follows:

CH: UI/ What up Ike?  
IW: Hey Br, Shit I am probably  
CH: Yo  
IW: I am probably like five minutes  
CH: Alright I am here.  
IW: Alright cool  
CH: Alright, bye  
IW: Bye

After the above call, agents monitoring electronic video surveillance of Harper Jr's residence observed Harper Jr inside of his truck on Porter Street, adjacent to his upper driveway. At approximately 12:56 pm, Harper Jr backed his truck to the lower driveway of his residence. At approximately 1:04 pm, Warren arrived in his white GMC Terrain bearing PA registration LLR-1226, determined to be registered to Isaiah Warren, 246 Mansion Street, Pittsburgh, PA 15207, on a 2017 GMC. Warren exited his vehicle and entered the front passenger's side of Harper Jr's truck. He remained inside of the truck for less than five minutes before exiting and returning to his vehicle. Based upon the evidence developed during the course of this investigation and information gathered during the course of the investigation and the training and experience of your affiant, it is averred that the above conversation and subsequent actions were consistent with a narcotics transaction between Harper Jr and Warren. Physical surveillance units maintained a constant visual observation of Warren and his vehicle until 1:15 pm when a traffic stop was conducted when it was learned that Isaiah Warren was driving with a suspended driver's license. During the course of surveillance, Warren did not stop at any locations and/or meet with any individuals until he was pulled over by law enforcement. A consent search was conducted and a seizure of approximately 4 ounces (112 grams) of cocaine was recovered from Warren's vehicle.

At approximately 1:28 pm, Detective Summers read Isaiah Warren his Miranda rights. Subsequently, your affiant interviewed Isaiah Warren at the White Oak Police Department. Warren indicated that he had just left 3401 O'Neil Blvd. McKeesport, PA and had met with Curtis Harper Jr. Isaiah Warren stated that it was at that time he bought the four (4) ounces of cocaine from Curtis Harper Jr. Isaiah Warren advised your affiant that he has been meeting with Curtis Harper Jr for approximately 2-3 months and that he has been buying approximately 3-4 ounces of cocaine from Harper Jr every 3-4 weeks during that time period. Isaiah Warren confirmed his cellular telephone number to be 412-294-2750.

Your affiant believes enough probable cause exists for Isaiah Warren to answer to the above listed charges and requests a warrant be issued.

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 14-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923401-3	Complaint/Incident Number ASAP-735245/BN5220037
Defendant Name	First: ISAIAH	Middle:	Last: WARREN

I, JOSEPH SEABURN, 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.

/JOSEPH SEABURN/

(Signature of Affiant)

831

Sworn to me and subscribed before me this 4 day of January, 2023

Date

Magisterial District Judge

My commission expires first Monday of January,

SEAL

EUGENE F. RIAZZI, JR.,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-13  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2026

ORIGINAL

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY

MDJ: Hon. EUGENE F RIAZZI  
Magisterial District Number: 05-2-13  
Address: 687 O'NEIL BLVD  
MCKEESPORT, PA 15132

Phone: 412.664.4612



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:

(NAME and ADDRESS):

RAMONE

WILLIAMS

First Name

Middle Name

Last Name

Gen.

522 HOWARD ST E PITTSBURGH, PA 15112

NCIC Extradition Code Type

Felony - Full Extradition

Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number 13-23	Date Filed 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 02/05/1984	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>
RACE BLACK	First Name		Middle Name	Last Name
ETHNICITY	AKA			
HAIR COLOR BLK (BLACK)		EYE COLOR BRO (BROWN)		
DNA	DNA Location		WEIGHT (lbs.)	
FBI Number	MNU Number		200	
Defendant Fingerprinted	Fingerprint Classification		5 11	

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, JOSEPH SEABURN

(Name of the Affiant)

300271

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

of ATTORNEY GENERAL

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

with violating the penal laws of the Commonwealth of Pennsylvania at

304

(Subdivision Code)

MCKEESPORT CITY

(Place-Political Subdivision)

In Allegheny County

02

(County Code)

on or about 10/27/2022 19:05

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037
Defendant Name	First: RAMONE	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	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, TRAFFICKING COCAINE in violation of 18 Pa. C.S. §911(b)(3).									

<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	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 CURTIS HARPER 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).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037
Defendant Name	First: RAMONE	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	7512	A	of the	18	1	F3	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 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, USED CELL PHONE TO TO DELIVER COCAINE, in violation of 18 Pa.C.S. § 7512.									

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)	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:									
18 903(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 CURTIS HARPER 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).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037
Defendant Name	First: RAMONE	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?	Offense# 5	Section 780-113	Subsection A30	of the	PA Statute (Title) 35	Counts 1	Grade 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 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, 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?	Offense# 6	Section 780-113	Subsection A16	of the	PA Statute (Title) 35	Counts 1	Grade 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 1 COUNT									
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).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>13-23</b>	Date Filed: <b>1-4-23</b>	OTN/LiveScan Number <b>G 923400-2</b>	Complaint/Incident Number <b>ASAP-735240/BN5220037</b>
Defendant Name	First: <b>RAMONE</b>	Middle:	Last: <b>WILLIAMS</b>

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.)

01/04/2023

(Date)

/JOSEPH SEABURN/  
(Signature of Affiant)

*[Handwritten Signature]* 831

AND NOW, on this date 1-4-23 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.

05-2-13  
(Magisterial District Court Number)

E. RIAZZI  
(Issuing Authority)



EUGENE F. RIAZZI, JR.,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-13  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2026

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037
Defendant Name	First: RAMONE	Middle:	Last: WILLIAMS

## AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:  
10/27/2022
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:  
10/27/2022

2. HOW:

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

3. WHAT CRIMES:

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

4. WHERE CRIME(S) COMMITTED:

MCKEESPORT, 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

ORIGINAL





## POLICE CRIMINAL COMPLAINT

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037
Defendant Name	First: RAMONE	Middle:	Last: WILLIAMS

Your Affiant, Narcotics Agent Joseph Seaburn, being duly sworn according to law, avers that the following is true and correct to the best of his knowledge, information and belief and is based on personal knowledge or information provided by reliable sources:

Your Affiant, Joseph E. Seaburn, 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 December of 2016. Your affiant, from December 2016 to December 2017 was employed by the New Castle Police Department as well as the Mercer Borough Police Department. From December 2017 to May 2021 your affiant was employed by the Pittsburgh Bureau of Police. Since May of 2021, your Affiant has been employed with the Pennsylvania Office of Attorney General in the Bureau of Narcotics Investigation and Drug Control. Your Affiant is currently assigned to the North Huntingdon Office, Narcotics Division. As a Narcotics Agent of the Pennsylvania Office of the 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.

Your Affiant, while employed as a Narcotics Agent II, Pittsburgh Police Officer, New Castle Police Officer and Mercer Borough Police Officer, has been involved in numerous investigations concerning narcotics violations and of the Controlled Substance, Drug, Device and Cosmetic Act. While employed at the city of Pittsburgh Police, your Affiant worked as a Patrol Officer as well as a Plain Clothes Detective. During your Affiant's career as a Pittsburgh Police Officer, your Affiant had been involved in hundreds of arrests and convictions. Specifically, your Affiant has made numerous arrests for violations of the Drug Device and Cosmetic Act, resulting in numerous convictions for these offenses.

Your Affiant has applied for, obtained, and executed search warrants, as well as made seizures of narcotics, firearms and other materials involved in the packaging and distribution of narcotics. Your Affiant has been involved in numerous undercover purchases of controlled substances. Your Affiant has extensively interviewed dozens of individuals involved in selling or using of illegal narcotics. These individuals have provided your Affiant with detailed information concerning the terminology of the sale of narcotics, how illegal narcotics are sold, manufactured, cultivated, and used. Your Affiant has attended numerous trainings and academies as a Police Officer and Narcotics Agent.

As a result of his training and experience, your Affiant has extensive knowledge regarding illegal drugs and the business of illegal drug sales, as well as the methods utilized by drug traffickers in the sale and distribution of controlled substances. This includes but is not limited to, the tactics and methods of communication, including the fact that drug users and traffickers often speak in "code" when discussing drugs and drug transactions, and other methods employed by illegal drug traffickers in furtherance of their criminal conduct and in an effort to avoid law enforcement detection.

Affiant Seaburn 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 of April 14, 1972, P.L. 233, No. 64, Section 1, et seq., and related offenses under the Pennsylvania Crimes Code.

Affiant Seaburn 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 of April 14, 1972, P.L. 233, No. 64, Section 1, et seq., and related offenses under the Pennsylvania Crimes Code.

On October 27, 2022, an Order (Misc. No. 12-08 W.D. 2022) authorizing the interception of wire and electronic communication of Curtis Harper Jr, Target Telephone 1 (412-537-8372) was signed by the Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania. On November 26, 2022 an extension order authorizing the extension of the interception of wire and electronic communication of Curtis Harper Jr, 412-537-8372 was signed by Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania.

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037
Defendant Name	First: RAMONE	Middle:	Last: WILLIAMS

Ramone Williams (412-853-8568) has been identified as a co-conspirator in Curtis Harper Jr's drug trafficking organization (DTO). During the execution of the Order authorizing the interception of wire and electronic communications, pertinent communication between Curtis Harper Jr. (Target Telephone 1) and Ramone Williams (412-853-8568) has been intercepted. This phone number (412-853-8568) came back with no listed subscriber. The address this phone is subscribed to is 522 Howard St., East Pittsburgh, PA 15112. Ramone Williams carries a JNET address of 522 Howard St., E Pittsburgh, PA 15112.

The residence of 3401 O'Neil Blvd McKeesport, PA 15132 and Curtis Harper Jr's 2020 Maroon GMC Sierra PA ZPX8492 (VIN 3GTU9BED3LG190276) have been under electronic and physical surveillance since February 2022. During that time your affiant has viewed numerous hand to hand transactions which through my training, experience, and knowledge of the case are indicative of illegal narcotic transactions. On these occasions Curtis Harper Jr was observed exiting his stated residence or arriving at his residence then driving the stated GMC Sierra Truck to the lower side driveway near the dog kennel area of the residence. Curtis Harper Jr would then either meet individuals in the lower side driveway or in the front top driveway of his residence 3401 O'Neil Blvd McKeesport, PA while he remained seated in the driver's seat of his vehicle. Curtis Harper Jr would then either do a hand to hand transaction through the front driver's side window of the vehicle or the individual would enter the passenger side seat of the vehicle then exit the vehicle after a short period of time. On multiple occasions electronic surveillance viewed Curtis Harper Jr counting a large sum of U.S Currency after these meetings. Curtis Harper Jr would remain in his vehicle for a period of time after these meetings before going back into his stated residence.

On October 27, 2022, at 1905 hours, Curtis Harper Jr. received a call from 412-853-8568. The conversation is as follows:

CH: Curtis Harper Jr

RW: Ramone Williams

CH: What's up cuzzo

RW: he's bringing that to me now bro, I'm a bring that to you, tonight

CH: alright Umm, I can't get them out until the morning, U/I I meet you there

RW: Oh, well fuck it, I'm a just hold them then. Cause I ain't

CH: Ok yeah

RW: U/I

CH/UM (talk over each other)

CH: okay alright, cool

On October 29, 2022, at 1320 hours, Curtis Harper Jr. received a call from 412-853-8568. The conversation is as follows:

CH: Curtis Harper Jr

RW: Ramone Williams

CH: What's up cuzzo ?

RW: You going to be around tonight?

CH: No I'm at my son's football game in Akron.

RW: I shoulda called you before I even told him to come here.

CH: Yea.

RW: I wasn't even thinking. When you gonna be back around?

CH: Ah, the game started at 2, so, we be back til probably like 6,7.

RW: Uh I'll probably catch you tomorrow.

CH: Okay. Alright cool

RW: Hmm.

CH: Bye

ORIGINAL

**POLICE CRIMINAL COMPLAINT**

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037
Defendant Name	First: RAMONE	Middle:	Last: WILLIAMS

On October 30, 2022, at 12:51 pm, Curtis Harper Jr. had a text message conversation with 412-853-8568. The text conversation is as follows (In addition, 412-853-8568 attempted to call Curtis Harper Jr. twice, at 1:05 pm and 1:40 pm, Harper Jr. not answering either call):

CH: Curtis Harper Jr

RW: Ramone Williams

RW: "Wyd kuzo"

RW: "Dude with me for swap"

CH: "Cuz not going to be around til after 4.. I'm in no hurry"

CH: "Can't talk im at a church / meeting event"

CH: "I'll hit you"

RW: "Oooh ok cook"

On October 31, 2022, at 1354 hours, Curtis Harper Jr. received a text message from 412-853-8568. The text message was as follows:

CH: Curtis Harper Jr

RW: Ramone Williams

RW: "Hit me kuzo"

On October 31, 2022, at 1354 hours, Curtis Harper Jr. called 412-853-8568. The conversation was as follows:

CH: Curtis Harper Jr

RW: Ramone Williams

RW: Hello?

CH: Yo, yo.

RW: What's up cuzzo?

CH: Nuttin man, what's happenin?

RW: Ah, shit my bad about yesterday hittin you back to back that nigga, them niggas was here.

CH: Yea I can't let that nigga sweat me like you know what I'm saying? I can't I can't you know.

RW: Yea, they think I ain't tryna, that's my bad though I was just calling to hit you apologize I ain't even been blowing you up like that.

CH: Yea, it's it's cool yea, you know I mean I don't I don't want like me I don't move like that cuz everytime I move like that something bad happen like you know I'm saying?

RW: Yea.

CH: Like, on on on everybody else's terms it ain't my terms you know especially after a bad a bad deal situation you know what I mean?

UM: Yea, yea, yep. No all good I was just calling to apologize cuz I didn't want you to think I was bein naggy I had nuttin to do with it dude. He showed up at my crib like " Please shoot your cuz shoot your cuz" , and when you didn't answer...

CH: alright that that just me cuz I just don't do shit like that like you know what I mean?

UM: No all good I was just calling to apologize cuz I didn't want you to think I was bein naggy I had nuttin to do with it dude. He showed up at my crib like " Please shoot your cuz shoot your cuz" , and when you didn't answer..

CH: Yea but you you gotta be careful when they just poppin up like that shit like you know what I'm sayin. I know I know dude I know dudes straight but I mean you know shit like that when you got you got you got mafuckin anxious something to me is just you know what I mean it just it ain't right to me. You know what I mean.

ORIGINAL



## POLICE CRIMINAL COMPLAINT

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN6220037
Defendant Name	First: RAMONE	Middle:	Last: WILLIAMS

UM: Oh no no no. Okay.

CH: Ya know you know what I mean just to it just it just my old ways of of of being man. Like you know?

UM: You the man.

CH: Especially when I was spending my money like it ain't like you givin me shit, you know what I'm sayin? you you tryin to you know you tryin to get me to spend my money and try to rush me and that's what happened last time. Thinkin I'm gonnna ya know what I mean thinkin I'm getting a nice deal and not fuckin up losin like you know what I mean rushing me so I just take my I just you know that's the way I am U.

UM: No learn learn learning the process I'm still learning from...

CH: Right. See what I'm sayin anytime cuz I can say it ain't it ain't like he givin that shit away you know what I mean?

UM: Yea when you home man well I'll just talk to you when I see you but um I'll just talk to you when I see you. I don't wanna talk bad um but yeah that's all I was just callin to hit you I didn't want you to think I was naggy.

CH: It's cool man I mean I mean I I you know.

UM: Alright.

CH: Alright, alright cousin.

On November 16, 2022 at approximately 11:53 am, Agents were monitoring electronic video surveillance of 3401 O'Neil Blvd, McKeesport, PA when they observed a grey in color Ford F-150 bearing PA registration ZTG5664 approach the area on Porter Street. The vehicle parked adjacent to the upper driveway of Curtis Harper Jr's residence. Curtis Harper Jr. was sitting inside of his truck (2020 GMC Sierra) on Porter Street when the driver of the F-150 exited his vehicle. The driver and registered owner was positively identified as Ramone Williams. Williams was wearing a grey hooded sweatshirt with white lettering, dark pants, and brown work boots with no shoelaces. Agents were able to observe Williams as he entered the front passenger's side door of Harper Jr's truck. Harper Jr. was observed handing Williams's two white boxes with red edges, believed to be vape pens that were discussed in previous sessions. Williams examined the boxes and placed them on the dash of the truck. Williams then handed Harper Jr. what appeared to be a knotted plastic baggy with an unknown white substance inside of one of the corners. Harper Jr took the item, untied the knot, and examined the contents. He put his right index finger inside of the bag and then placed his finger up towards his mouth. Harper Jr. manipulated the contents of the bag, tied a knot in it, and placed it out of view. Based on the training, education, experience, and familiarity with this case, your affiant believes that the unidentified substance was packaged and manipulated in a manner consistent with powdered cocaine.

Curtis Harper Jr. and Williams continued to talk until 12:04 PM when Williams was observed gathering the white and red boxes from his lap as he retrieved an unknown amount of U.S. currency from his pocket. Williams appeared to count the currency and handed a portion of it to Harper Jr. Harper Jr. took the money, folded it, and placed it in/on the center console of his truck. The two remained inside of the vehicle until Williams exited and returned to his vehicle at 12:13 PM.

Detective Grbach and Narcotics Agents Sepic and Antonucci were directed to follow Williams in his Ford F-150 as it departed the area. Agents followed Williams to his residence at 522 Howard Street, East Pittsburgh, PA. Williams was observed walking away from the truck and then standing on the front porch of the residence as surveillance units circled the block. At approximately 12:27 PM, Detective Grbach observed Williams walk across the street and enter his grey Ford F-150. Surveillance units followed Williams as he travelled to the Great Valley Shopping Center on Lincoln Highway in North Versailles, PA. While in the shopping center parking lot, Agent Antonucci observed a white male wearing blue jeans and a grey sweatshirt enter the front passenger's side of Williams' truck. The truck circled the parking lot before Detective Grbach observed it stopped in front of a dark grey Ford Taurus bearing PA registration JDB6315, registered to Phillip Hipple. Detective Grbach noted in his surveillance report that he observed the lights of the Taurus illuminate within seconds of Williams' truck pulling away and there were no other vehicles that moved in the vicinity of the parking lot at this time. Believing that a possible narcotics transaction had occurred inside of Williams' truck, Detective Grbach and Agent's Sepic and Antonucci followed the Taurus as it exited the parking lot and traveled on Route 30 towards North Huntingdon Township.

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037
Defendant Name	First: RAMONE	Middle:	Last: WILLIAMS

On November 16, 2022 at approximately 1259 hours Officer Benick was able to locate PA registration JDB6315 traveling on Clay Pike. A traffic stop was conducted in the parking lot of the Marathon Gas Station located at 1111 Clay Pike, Irwin PA, 15642. Det. Rebel arrived and began to speak with Hipple. Hipple was observed to be extremely nervous, shaking and unable to maintain eye contact with Officer Rebel while speaking. Hipple was asked where he was coming from, to which he appeared to forget exactly where he was coming from. Det. Rebel asked Hipple if he had any narcotics inside of his vehicle, to which Hipple admitted that he had a quarter ounce of cocaine in the center console under the radio. Hipple then provided consent to retrieve the narcotics from the vehicle. Hipple was then asked for consent to search the entire vehicle for further narcotics, to which Hipple provided consent. Det. Rebel retrieved a clear baggy containing cocaine from the center console area. A search of the interior of the vehicle yielded no further narcotics.

Your affiant Agent Seaburn and Agent Snyder met with Phillip Hipple at North Huntington Police Department and read him his Miranda Warnings. Hipple stated to your affiant that he had just bought the 28 grams of cocaine from Ramone Williams at the Green Valley Shopping Center. Hipple advised he purchased the cocaine for \$350 and was purchasing it through Ramone Williams for a friend.

Your affiant and Agent Snyder met with Phillip Hipple at North Huntington Police Department and read him his Miranda Warnings. Hipple stated to your affiant that he had just bought the 28 grams of cocaine from Ramone Williams at the Green Valley Shopping Center. Hipple advised he purchased the cocaine for \$350 and was purchasing it through Ramone Williams for a friend.

On November 17, 2022, at 11:11 am, Curtis Harper Jr. received a text message from 412-853-8568 (positively identified by agents as Ramone Williams through physical ID). The text message conversation is as follows:

CH: Curtis Harper Jr                      RW: Ramone Williams

RW: "You going be around im grab that 7 after gym"

RW: "I got come port"

CH: "Around what time"

RW: "Neee one more pen to"

CH: "thumbs up emoji, square symbol)"

CH: "?"

RW: "Here i come leaving gym kuz"

CH: "thumbs up emoji, square symbol)"

On November 17, 2022, at approximately 10:57 am, video surveillance depicted Curtis Harper Jr.'s GMC Sierra truck departed from his residence of 3401 O'Neil Blvd., McKeesport, PA. At approximately 11:26 am, the GMC Sierra truck returned and drove to the lower side driveway near the dog kennel area of the residence. At approximately 11:36 am, the GMC Sierra truck returned from the lower side driveway and parked in the driveway of the residence, before then parking on the road in front of the residence. Curtis Harper Jr. remained in the driver's seat of his truck the entire time, except for momentarily exiting the truck at approximately 12:27 pm, before re-entering the driver's side. At approximately 1:40 pm, a grey in color F-150, bearing PA registration ZTG5664, pulled in and parked behind the GMC Sierra truck. The driver and registered owner was positively identified as Ramone Williams. Williams exited the driver's side and proceeded to enter the front passenger side of Harper Jr.'s truck. At approximately 1:45 pm, Williams exited Harper Jr.'s truck and re-entered the Ford F-150, departing from the residence. Physical surveillance units followed Williams' truck from Harper Jr.'s residence to Port Perry Rd., subsequently observing it parked near 522 Howard St., E Pittsburgh.

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 13-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923400-2	Complaint/Incident Number ASAP-735240/BN5220037
Defendant Name	First: RAMONE	Middle:	Last: WILLIAMS

On November 17, 2022, at 1458 hours, Curtis Harper Jr. received an incoming text from 412-853-8568. The text conversation is as follows:

CH: Curtis Harper Jr

RW: Ramone Williams

RW: "Huh"

CH: "?"

RW: "You sent me message saying around what time"

RW: "At 251"

CH: "That was 3 hours ago Asking what time you was coming"

I, JOSEPH SEABURN, 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.

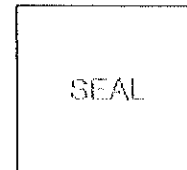
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

/JOSEPH SEABURN/

(Signature of Affiant)

Sworn to me and subscribed before me this 4 day of January, 2023  
E. Riazzi Date 1-4-23, Magisterial District Judge

My commission expires first Monday of January,



EUGENE F. RIAZZI, JR.,  
 MAGISTERIAL DISTRICT JUDGE  
 MAGISTERIAL DISTRICT 05-2-13  
 MY COMMISSION EXPIRES ON THE  
 FIRST MONDAY IN JANUARY, 2026

ORIGINAL

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY

MDJ: Hon. EUGENE F RIAZZI  
Magisterial District Number: 05-2-13  
Address: 687 O'NEIL BLVD  
MCKEESPORT, PA 15132

Phone: 412.664.4612



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:

(NAME and ADDRESS):

CORRY

JAMES

SANDERS

First Name

Middle Name

Last Name

Gen.

2010 JENNYLIND STREET MCKEESPORT, PA 15132

NCIC Extradition Code Type

Felony - Limited Extradition

Distance: 100

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <b>640-22-12-30-22</b>	Date Filed <b>12-30-22</b>	OTN/LiveScan Number <b>G 923060-5</b>	Complaint/Incident Number <b>ASAP-733866/BN5220037</b>	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 05/28/1970	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.)
FBI Number	MNU Number			190
Defendant Fingerprinted				Ft. HEIGHT In.
Fingerprint Classification				5 10
DEFENDANT VEHICLE INFORMATION				
Plate #	State	Hazmat	Registration Sticker (MM/YY)	Comm'l Veh. Ind.
VIN	Year	Make	Model	School Veh.
				Oth. NCIC Veh. Code
				Reg. Same as Def.

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, JOSEPH SEABURN

(Name of the Affiant)

300271

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

of ATTORNEY GENERAL

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

with violating the penal laws of the Commonwealth of Pennsylvania at

304

(Subdivision Code)

MCKEESPORT CITY

(Place-Political Subdivision)

In Allegheny County

02

(County Code)

on or about 09/21/2022 12:00



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923060-5	Complaint/Incident Number ASAP-733866/BN5220037
Defendant Name	First: CORRY	Middle: JAMES	Last: SANDERS

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	780-113	A30	of the	35	2	F		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
35 780-113A30 PROHIBITED ACTS - DELIVERY - SCHEDULES 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, delivered a controlled substance, namely, Cocaine, 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, delivered 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						
	2	780-113	A30	of the	35	2	F		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> 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, Cocaine, 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).									





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923060-5	Complaint/Incident Number ASAP-733866/BN5220037
Defendant Name	First: CORRY	Middle: JAMES	Last: SANDERS

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	780-113	A16	of the	35	2	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:									
35 780-113A16 PROHIBITED ACTS - POSSESSION M 2 COUNTS									
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).									
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 923060-5	Complaint/Incident Number ASAP-733866/BN5220037
Defendant Name	First: CORY	Middle: JAMES	Last: SANDERS

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.)**

\_\_\_\_\_, 12/30/2022

/JOSEPH SEABURN/  
(Signature of Affiant)

AND NOW, on this date 12/30/2022 (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.

05-2-22  
(Magisterial District Court Number)

(Issuing Authority)

CRAIG C. STEPHENS,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-22  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2023

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed:	OTN/LiveScan Number G 923060-5	Complaint/Incident Number ASAP-733866/BN5220037
Defendant Name	First: CORY	Middle: JAMES	Last: SANDERS

**AFFIDAVIT of PROBABLE CAUSE****1. WHEN:**

- a) Date when Affiant received information:

11/22/2022

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

11/22/2022

**2. HOW:**

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

Affiant's Investigation

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

Affiant's Investigation

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

Affiant's Investigation

**3. WHAT CRIMES:**

35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES 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 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES 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 MCKEESPORT, 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 923060-5	Complaint/Incident Number ASAP-733866/BN5220037
Defendant Name	First: CORY	Middle: JAMES	Last: SANDERS

Agents with the Pennsylvania Office of Attorney General developed information that Corry Sanders was distributing cocaine within the City of McKeesport, Pennsylvania. Through the course of the investigation, agents developed confidential informant(s) that were able to purchase cocaine directly from Sanders.

### Buy #1

On September 21 2022, agents met with a confidential informant who was able to purchase cocaine from Sanders. The confidential informant was searched by Agent Seaburn prior to conducting the purchase as well as his/her vehicle. The confidential informant was then provided with prerecorded funds to purchase the cocaine. The confidential informant remained under constant surveillance during the entire purchase. The confidential informant then made contact with Sanders who directed the confidential informant to meet a specific location.

The confidential informant then traveled to the predetermined meeting location. Agents followed and maintained surveillance on the confidential informant. The confidential informant then met with Sanders. Sanders then completed the hand to hand transaction outside of his black Nissan Pathfinder.

The confidential informant then returned to his/her vehicle and returned to the predetermined meeting location with agents. Agent Seaburn then immediately recovered the purchased cocaine. The confidential informant was then searched for any further contraband yielding negative results. The purchased cocaine was then field tested by Agent Seaburn utilizing a NIK wipe, which showed positive results for the presence of cocaine. The cocaine was then properly packaged and sent to the Pennsylvania State Police Greensburg Lab.

### Buy #2

On November 22, 2022, agents met with a confidential informant who was able to purchase cocaine from Sanders. The confidential informant was searched by Agent Seaburn prior to conducting the purchase as well as his/her vehicle. The confidential informant was then provided with prerecorded funds to purchase the cocaine. The confidential informant remained under constant surveillance during the entire purchase. The confidential informant then made contact with Sanders who directed the confidential informant to meet at a specific location.

The confidential informant then traveled to the predetermined meeting location. Agents followed and maintained surveillance on the confidential informant. The confidential informant then met with Sanders inside of Kool Kutz 2 barbershop. The barbershop is located at 603 Locust Street, McKeesport, PA 15132. Sanders then completed the hand to hand transaction with the confidential informant and the confidential informant left the establishment.

The confidential informant then returned to his/her vehicle and returned to the predetermined meeting location with agents. Agent Seaburn then immediately recovered the purchased cocaine. The confidential informant was then searched for any further contraband yielding negative results. The purchased cocaine was then field tested by Agent Seaburn utilizing a NIK wipe, which showed positive results for the presence of cocaine. The cocaine was then properly packaged and sent to the Pennsylvania State Police Greensburg Lab.



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923060-5	Complaint/Incident Number ASAP-733866/BN5220037
Defendant Name	First: CORY	Middle: JAMES	Last: SANDERS

I, JOSEPH SEABURN, 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.

/JOSEPH SEABURN/

(Signature of Affiant)

Sworn to me and subscribed before me this 30 day of DEC 2022  
12/30/2022 Date C. C. Stephens, Magisterial District Judge

My commission expires first Monday of January,

2028

CRAIG C. STEPHENS,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-22  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2028

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY

MDJ: Hon. EUGENE F RIAZZI  
Magisterial District Number: 05-2-13  
Address: 687 O'NEIL BLVD  
MCKEESPORT, PA 15132

Phone: 412.664.4612



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

**DEFENDANT:**

(NAME and ADDRESS):

KALEB

HOWARD

First Name

Middle Name

Last Name

Gen.

408 WELSH AVENUE WILMERDING, PA 15148

**NCIC Extradition Code Type**

Felony - Limited Extradition

Distance: 100

**DEFENDANT IDENTIFICATION INFORMATION**

Docket Number 641-22-12-30-22	Date Filed 12-30-22	OTN/LiveScan Number G 923061-6	Complaint/Incident Number ASAP-733870/BN5220037	Request Lab Services? <input type="checkbox"/> Yes			
GENDER MALE	DOB 08/31/1989	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.) 165			
FBI Number	MNU Number		Ft. HEIGHT In. 6 01				
Defendant Fingerprinted							
Fingerprint Classification							
<b>DEFENDANT VEHICLE INFORMATION</b>							
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		

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, JOSEPH SEABURN

(Name of the Affiant)

300271

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

of ATTORNEY GENERAL

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

with violating the penal laws of the Commonwealth of Pennsylvania at

304

(Subdivision Code)

MCKEESPORT CITY

(Place-Political Subdivision)

In Allegheny County

02

(County Code)

on or about 12/06/2022 12:00



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923061-6	Complaint/Incident Number ASAP-733870/BN5220037
Defendant Name	First: KALEB	Middle:	Last: HOWARD

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	780-113	A30	of the	35	1	F		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
35 780-113A30 PROHIBITED ACTS - DELIVERY - SCHEDULES I - IV F 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, delivered 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						
	2	780-113	A30	of the	35	1	F		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> 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 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, possessed with intent to deliver a controlled substance, namely, Cocaine, in violation of 35 P.S. §780-113(a) (30).									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923061-6	Complaint/Incident Number ASAP-733870/BN5220037
Defendant Name	First: KALEB	Middle:	Last: HOWARD

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	780-113	A16	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:									
35 780-113A16 PROHIBITED ACTS - POSSESSION M 1 COUNT 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).									





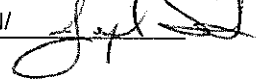
# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 923061-6	Complaint/Incident Number ASAP-733870/BN5220037
Defendant Name	First: KALEB	Middle:	Last: HOWARD

- 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.

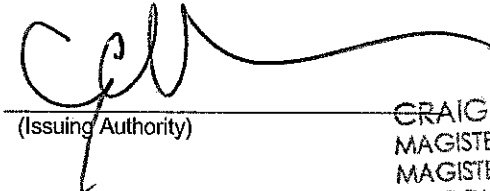
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

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

\_\_\_\_\_, 12/30/2022 \_\_\_\_\_ /JOSEPH SEABURN/  831  
(Date) (Signature of Affiant)

AND NOW, on this date 12/30/2022 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.

05-2-22   
(Magisterial District Court Number) (Issuing Authority)

**CRAIG C. STEPHENS,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-22  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2028**

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed:	OTN/LiveScan Number G 923061-6	Complaint/Incident Number ASAP-733870/BN5220037
Defendant Name	First: KALEB	Middle:	Last: HOWARD

**AFFIDAVIT of PROBABLE CAUSE****1. WHEN:**

- a) Date when Affiant received information:  
12/6/2022
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:  
12/6/2022

**2. HOW:**

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

**3. WHAT CRIMES:**

35 780-113 A30 PROHIBITED ACTS - DELIVERY - SCHEDULES 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:**

KOOL KUTZ 2

**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 923061-6	Complaint/Incident Number ASAP-733870/BN5220037
Defendant Name	First: KALEB	Middle:	Last: HOWARD

On December 6, 2022, agents with the Pennsylvania Office of Attorney General met with a confidential informant who was able to purchase cocaine from inside of the Kool Kutz 2 barbershop. The barbershop is located at 603 Locust Street, McKeesport, PA 15132. The confidential informant was searched by Agent Seaburn prior to conducting the purchase, as well as his/her vehicle. The confidential informant was then provided with prerecorded funds to purchase the cocaine. The confidential informant remained under constant surveillance during the entire purchase.

The confidential informant arrived at the barbershop and exited his/her vehicle. The confidential informant then entered the barbershop and a short time later he/she exited and returned to his/her vehicle. The confidential informant then returned to the predetermined meeting location with agents, while under constant surveillance. Agent Seaburn then immediately recovered the purchased cocaine. The confidential informant was then searched for any further contraband yielding negative results. The confidential informant then positively identified the male who he purchased the cocaine from as Kaleb Howard. The purchased cocaine was then field tested by Agent Seaburn utilizing a NIK wipe, which showed positive results for the presence of cocaine. The cocaine was then properly packaged and sent to the Pennsylvania State Police Greensburg Lab.

I, JOSEPH SEABURN, 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.

/JOSEPH SEABURN/  831

(Signature of Affiant)

Sworn to me and subscribed before me this 30 day of DEC, 2022  
12/30/2022 Date C. C. F., Magisterial District Judge

My commission expires first Monday of January,

2028

CRAIG C. STEPHENS,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-22  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2028

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY

MDJ: Hon. EUGENE F RIAZZI  
Magisterial District Number: 05-2-13  
Address: 687 O'NEIL BLVD  
MCKEESPORT, PA 15132

Phone: 412.664.4612



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:  
ROBERT

(NAME and ADDRESS):

MCLEAN

First Name

Middle Name

Last Name

Gen.

1615 SHAW AVE MCKEESPORT, PA 15132

NCIC Extradition Code Type

Felony - Full Extradition

Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number 12-23	Date Filed 1-4-23	OTN/LiveScan Number G 923399-1	Complaint/Incident Number ASAP-736242/BN6220037	Request Lab Services? <input type="checkbox"/> Yes
GENDER MALE	DOB 01/14/1963	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>
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.) 185
FBI Number	MNU Number		Ft. HEIGHT in. 6 00	
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.
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, JOSEPH SEABURN	300271
(Name of the Affiant)	(PSP/MP/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. <input checked="" type="checkbox"/> 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 _____	
304	MCKEESPORT CITY
(Subdivision Code)	(Place-Political Subdivision)
In Allegheny County	02
(County Code)	on or about 10/30/2022 12:00

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 12-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923399-1	Complaint/Incident Number: ASAP-735242/BN5220037
Defendant Name	First: ROBERT	Middle:	Last: MCLEAN

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	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).									

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, Trafficking Cocaine in violation of 18 Pa. C.S. §911(b)(3).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 12-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923399-1	Complaint/Incident Number ASAP-735242/BN5220037
Defendant Name	First: ROBERT	Middle:	Last: MCLEAN

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)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	Safety Zone <input type="checkbox"/> Work Zone <input type="checkbox"/>		
Statute Description/Acts of the accused associated with this Offense:									
18 911B4 CORRUPT ORGANIZATION F1 1 COUNT The actor conspired with Curtis Harper Jr 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	7512	A	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	Safety Zone <input type="checkbox"/> Work Zone <input type="checkbox"/>		
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, Trafficking Cocaine, in violation of 18 Pa.C.S. § 7512.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	5	903	(A)(1)	of the	18	1	F	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	Safety Zone <input type="checkbox"/> Work Zone <input type="checkbox"/>		
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 Curtis Harper Jr 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).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 12-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923399-1	Complaint/Incident Number ASAP-735242/BN5220037
Defendant Name	First: ROBERT	Middle:	Last: MCLEAN

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	1	F	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (If applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	Safety Zone	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 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, 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	1	M	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (If applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	Safety Zone	Work Zone	
Statute Description/Acts of the accused associated with this Offense:									
35 780-113A16 PROHIBITED ACTS - POSSESSION M 1 COUNT									
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).									

ORIGINAL



# POLICE CRIMINAL COMPLAINT

Docket Number: 12-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923399-1	Complaint/Incident Number ASAP-735242/BN5220037
Defendant Name	First: ROBERT	Middle:	Last: MCLEAN

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.)

01/04/2023

/JOSEPH SEABURN/  
(Signature of Affiant)

*[Handwritten Signature]* 831

(Date)

AND NOW, on this date 1-4-23 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.

05-2-13  
(Magisterial District Court Number)

*[Handwritten Signature]*  
(Issuing Authority)

SEAL

EUGENE F. RIAZZI, JR.,  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-13  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2026

ORIGINAL





# POLICE CRIMINAL COMPLAINT

Docket Number: 12-23	Date Filed: 1-4-23	OTN/LiveScan Number G 923399-1	Complaint/Incident Number ASAP-735242/BN5220037
Defendant Name	First: ROBERT	Middle:	Last: MCLEAN

## AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:  
10/30/2022
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:  
10/30/2022

2. HOW:

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

3. WHAT CRIMES:

18 911 B4 CORRUPT ORGANIZATION  
18 6105 A1 PERSONS NOT TO POSSESS, USE, MANUFACTURE, CONTROL, SELL OR TRANSFER FIREARMS  
18 911 B3 CORRUPT ORGANIZATION  
35 780-113 A30 PROHIBITED ACTS - POSSESSION WITH INTENT TO DELIVER - SCHEDULE I - IV  
35 780-113 A16 PROHIBITED ACTS - POSSESSION  
18 7512 A CRIMINAL USE OF COMMUNICATION FACILITY  
18 903 (A)(1) CRIMINAL CONSPIRACY

4. WHERE CRIME(S) COMMITTED:

MCKEESPORT PENNSYLVANIA

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

ORIGINAL



## POLICE CRIMINAL COMPLAINT

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Defendant Name	First: ROBERT	Middle:	Last: MCLEAN

Your Affiant, Narcotics Agent Joseph Seaburn, being duly sworn according to law, avers that the following is true and correct to the best of his knowledge, information and belief and is based on personal knowledge or information provided by reliable sources:

Your Affiant, Joseph E. Seaburn, 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 December of 2016. Your affiant, from December 2016 to December 2017 was employed by the New Castle Police Department as well as the Mercer Borough Police Department. From December 2017 to May 2021 your affiant was employed by the Pittsburgh Bureau of Police. Since May of 2021, your Affiant has been employed with the Pennsylvania Office of Attorney General in the Bureau of Narcotics Investigation and Drug Control. Your Affiant is currently assigned to the North Huntingdon Office, Narcotics Division. As a Narcotics Agent of the Pennsylvania Office of the 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.

Your Affiant, while employed as a Narcotics Agent II, Pittsburgh Police Officer, New Castle Police Officer and Mercer Borough Police Officer, has been involved in numerous investigations concerning narcotics violations and of the Controlled Substance, Drug, Device and Cosmetic Act. While employed at the city of Pittsburgh Police, your Affiant worked as a Patrol Officer as well as a Plain Clothes Detective. During your Affiant's career as a Pittsburgh Police Officer, your Affiant had been involved in hundreds of arrests and convictions. Specifically, your Affiant has made numerous arrests for violations of the Drug Device and Cosmetic Act, resulting in numerous convictions for these offenses.

Your Affiant has applied for, obtained, and executed search warrants, as well as made seizures of narcotics, firearms and other materials involved in the packaging and distribution of narcotics. Your Affiant has been involved in numerous undercover purchases of controlled substances. Your Affiant has extensively interviewed dozens of individuals involved in selling or using of illegal narcotics. These individuals have provided your Affiant with detailed information concerning the terminology of the sale of narcotics, how illegal narcotics are sold, manufactured, cultivated, and used. Your Affiant has attended numerous trainings and academies as a Police Officer and Narcotics Agent.

As a result of his training and experience, your Affiant has extensive knowledge regarding illegal drugs and the business of illegal drug sales, as well as the methods utilized by drug traffickers in the sale and distribution of controlled substances. This includes but is not limited to, the tactics and methods of communication, including the fact that drug users and traffickers often speak in "code" when discussing drugs and drug transactions, and other methods employed by illegal drug traffickers in furtherance of their criminal conduct and in an effort to avoid law enforcement detection.

Affiant Seaburn 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 of April 14, 1972, P.L. 233, No. 64, Section 1, et seq., and related offenses under the Pennsylvania Crimes Code.

Affiant Seaburn 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 of April 14, 1972, P.L. 233, No. 64, Section 1, et seq., and related offenses under the Pennsylvania Crimes Code.

On October 27, 2022, an Order (Misc. No. 12-08 W.D. 2022) authorizing the interception of wire and electronic communication of Curtis Harper Jr, Target Telephone 1 (412-537-8372) was signed by the Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania. On November 26, 2022 an extension order authorizing the extension of the interception of wire and electronic communication of Curtis Harper Jr, 412-537-8372 was signed by Honorable Judge Mary Jane Bowes, Judge of the Superior Court of Pennsylvania.

ORIGINAL



# POLICE CRIMINAL COMPLAINT

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Defendant Name	First: ROBERT	Middle:	Last: MCLEAN

Robert McLean (412-916-6429) has been identified as a co-conspirator in Curtis Harper Jr's drug trafficking organization (DTO). During the execution of the incorporated Order authorizing the interception of wire and electronic communications, pertinent communication between Curtis Harper Jr. (Target Telephone 1) and Robert McLean (412-916-6429) has been intercepted. This phone number (412-916-6429) is subscribed to Robert McLean. The address this phone is subscribed to is 1315 Centennial Street McKeesport, PA. 1315 Centennial St McKeesport, PA is owned by Earnest and Mazie McLean (relatives of Robert McLean).

The residence of 3401 O'Neil Blvd McKeesport, PA 15132 and Curtis Harper Jr's 2020 Maroon GMC Sierra PA ZPX8492 (VIN 3GTU9BED3LG190276) have been under electronic and physical surveillance since February 2022. During that time your affiant has viewed numerous hand to hand transactions which through my training, experience, and knowledge of the case are indicative of illegal narcotic transactions. On these occasions Curtis Harper Jr was observed exiting his stated residence or arriving at his residence then driving the stated GMC Sierra Truck to the lower side driveway near the dog kennel area of the residence. Curtis Harper Jr would then either meet individuals in the lower side driveway or in the front top driveway of his residence 3401 O'Neil Blvd McKeesport, PA while he remained seated in the driver's seat of his vehicle. Curtis Harper Jr would then either do a hand to hand transaction through the front driver's side window of the vehicle or the individual would enter the passenger side seat of the vehicle then exit the vehicle after a short period of time. On multiple occasions electronic surveillance viewed Curtis Harper Jr counting a large sum of U.S Currency after these meetings. Curtis Harper Jr would remain in his vehicle for a period of time after these meetings before going back into his stated residence.

On October 30, 2022 at 1015 hours, Curtis Harper Jr received a text message call from telephone number 412-916-6429 (positively identified by Agents as Robert McLean through physical ID). The text conversation is as follows:

CH: Curtis Harper Jr      RM: Robert McLean

RM: "I'm Up"

RM: "Call when outside"

CH: "10:15"

RM: "Yep"

After the communication took place Curtis Harper Jr was in the front driver's seat of his vehicle and backed down the lower driveway toward the kennel area at his residence at 3401 O'Neil Blvd McKeesport, PA at 10:15am. During a subsequent search warrant on the residence of 3401 Oneil Blvd McKeesport, PA approximately one (1) Kilogram of cocaine was found in a retaining wall in this area. Curtis Harper Jr. was then viewed driving from the lower side driveway and leaving his residence in his vehicle at 10:17am. Surveillance units were able to maintain surveillance on Curtis Harper Jr to 1615 Shaw Avenue McKeesport, PA. Harper's vehicle was then viewed unoccupied in front of the stated residence at 1020 hours. At 10:26am Agents were able to observe four males leaving the residence of 1615 Shaw Avenue McKeesport, PA one of the males being positively identified as Curtis Harper Jr.

On November 15, 2022 at 1249 hours, Curtis Harper Jr received a text message from 412-916-6429 (positively identified by Agents as Robert McLean through physical ID). The text conversation is as follows:

CH: Curtis Harper Jr      RM: Robert McLean

RM : "At my house hit me when close"

CH: thumbs up emoji

CH: "1 minute"

ORIGINAL



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Concurrent with the communication surveillance was able to view Curtis Harper Jr in the front driver's seat of his vehicle back down the lower driveway toward the kennel area of his residence at 3401 O'Neil Blvd McKeesport, PA at 1:13pm. Curtis Harper Jr was there until 1:17pm when he left the lower side driveway and departed his residence. Surveillance was able to follow Curtis Harper Jr go directly to 1615 Shaw Ave McKeesport, PA. Curtis Harper Jr. was viewed at 1615 Shaw Avenue at 1:23pm. Curtis Harper Jr. shortly after departed the residence of 1615 Shaw Ave.

On the date of December 6, 2022 at approximately 12:44 pm, Curtis Harper Jr received a text message from 412-916-6429 (positively identified by Agents as Robert McLean through physical ID). The text conversation is as follows:

CH: Curtis Harper Jr      RM: Robert McLean

RM: Centennial St  
CH: 30 Minutes

After the communication took place Curtis Harper Jr arrived home in the front driver's seat of his vehicle and backed down the lower driveway toward the kennel area at his residence at 3401 O'Neil Blvd McKeesport, PA. At 1:11pm. Curtis Harper Jr. was then viewed driving from the lower side driveway and leaving his residence in his vehicle at 1:14pm.

At 1:19pm, surveillance units viewed Curtis Harper Jr arrive at 1315 Centennial St and he backed down the driveway. Prior to Curtis Harper Jr's arrival Robert McLean arrived at the Robert McLean's residence and backed down the driveway in a Ford Mustang. At 1:27pm, Curtis Harper Jr was viewed leaving 1315 Centennial St. Robert McLean left 1315 Centennial Street McKeesport PA after Curtis Harper Jr left. Physical surveillance units observed Robert McLean leave 1315 Centennial Street McKeesport, PA and walk back to 1615 Shaw Ave McKeesport, PA.

On December 5, 2022, Agents from the Office of the Attorney General in conjunction with DANET Detectives conducted a trash pull on the residence of 1615 Shaw Avenue McKeesport, PA 15132. As a result of this trash pull Agents and Detectives recovered seventeen (17) sandwich baggies with missing corners, three (3) sandwich baggies with missing corners which were NIK tested by Agents and found positive for the presence of cocaine, and indicia for Jan McLean to the address of 1615 Shaw Ave McKeesport, PA. Through your affiants training and experience with cocaine it is known that sandwich baggies are used to package cocaine for sale with the corners ripped off to be used to tie a knot on the baggie to be sealed. All items recovered were found in the same bag together. It is known that those who engage in illegal narcotic sales of cocaine maintain proceeds of narcotics transactions; records/books of drug transactions, drug ledgers; narcotics paraphernalia including cutting agents, scales and packaging items; indicia of residency/ownership.

The multiple sandwich baggies were ripped to be packaged for ale in conjunction with the baggies being NIK tested and found positive for the presence of cocaine. All of the stated items were located in the same garbage bag together located with multiple forms of indicia directly corresponded to the address of 1615 Shaw Ave McKeesport, PA.

On December 7, 2022, a sealed search warrant (warrant control number BN5220037-8) was served at the residence of Robert McLean, 1615 Shaw Ave., McKeesport, PA, Allegheny County. Robert McLean and Jan McLean were present at the residence. The following items were located within the residence and seized: a knotted baggy of suspected Cocaine, a clear plastic bag with a missing corner, a U.S. dollar with Cocaine residue, a Remington model 514 firearm with an unknown serial number, (4) .22 caliber rounds, a utility bill in the name of Robert McLean, 1615 Shaw Ave., and a black Samsung Galaxy cell phone.

ORIGINAL



# POLICE CRIMINAL COMPLAINT

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Defendant Name	First: ROBERT	Middle:	Last: MCLEAN

Robert McLean's criminal history shows that on June 4, 1998, he plead guilty to (1) count of CS13 A 30, Manufacture of a Controlled Substance, graded a Felony, and (1) count of CC 903, Criminal Conspiracy to Manufacture a Controlled Substance, graded a Felony. Due to these felony convictions, McLean would be a person not to possess, use, manufacture, control, sell, and/or transfer a firearm.

I, JOSEPH SEABURN, 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.

/JOSEPH SEABURN/

(Signature of Affiant)

831

Sworn to me and subscribed before me this 4 day of January, 2023

Date

, Magisterial District Judge

My commission expires first Monday of January,

EUGENE F. RIAZZA, JR.  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 05-2-13  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2026

ORIGINAL