

COMMONWEALTH OF
PENNSYLVANIA
COUNTY OF: CENTRE



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 49-3-02
MDJ: Hon. KELLEY GILLETTE-WALKER
Address: 3555 BENNER PIKE, SUITE C,
BELLEFONTE, PA 16823
Telephone: (814)355-6739

DEFENDANT:

(NAME and ADDRESS):

AGOSTINO

SEBASTIANO

ABBATIELLO

First Name

Middle Name

Last Name

Gen.

85 MCKINLEY AVENUE, WESTBURY, NY 11590

DEFENDANT NEEDS TO BE PROCESSED

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| ☒ 1-Felony Full | ☐ 5-Felony Pend. | ☐ C-Misdemeanor Surrounding States | ☐ Distance: _____ |
| ☐ 2-Felony Ltd. | ☐ 6-Felony Pend. Extradition Determ. | ☐ D-Misdemeanor No Extradition | |
| ☐ 3-Felony Surrounding States | ☐ A-Misdemeanor Full | ☐ E-Misdemeanor Pending | |
| ☐ 4-Felony No Ext. | ☐ B-Misdemeanor Limited | ☐ F-Misdemeanor Pending Extradition Determ. | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-192-2006	Date Filed 08/17/2006	OTN/LiveScan Number G1021127-2	Complaint Number	Incident Number BN4240230T	Request Lab Services? ☐ YES ☒ NO
GENDER ☒ Male ☐ Female	DOB 06/18/2002	POB	Add'l DOB / /	Co-Defendant(s) ☒	
First Name		Middle Name		Last Name	
AKA					
RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown	ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown				
HAIR COLOR ☐ GRY (Gray) ☐ RED (Red/Aubn.) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☒ BRO (Brown) ☐ BLK (Black) ☐ ONG (Orange) ☐ WHI (White) ☐ XXX (Unk./Bald) ☐ GRN (Green) ☐ PNK (Pink) ☐ BLN (Blonde / Strawberry)					
EYE COLOR ☐ BLK (Black) ☐ BLU (Blue) ☒ BRO (Brown) ☐ GRN (Green) ☐ GRY (Gray) ☐ HAZ (Hazel) ☐ MAR (Maroon) ☐ PNK (Pink) ☐ MUL (Multicolored) ☐ XXX (Unknown)					
DNA ☐ YES ☒ NO	DNA Location				WEIGHT (lbs.)
FBI Number	MNU Number				
Defendant Fingerprinted ☐ YES ☒ NO					Ft. HEIGHT - In.
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		

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, DETECTIVE D. PAUL

(Name of the Affiant)

MO34567A / 3230

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

of STATE COLLEGE POLICE DEPARTMENT

(Identify Department or Agency Represented and Political Subdivision)

PA0140300

(Police Agency ORI Number)

FILED/RECEIVED BY

MDJ COURT 49-3-02

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above

AUG 17 2026

☐ I accuse the defendant whose name is unknown to me but who is described as

CENTRE COUNTY

☐ 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

BELLEFONTE, PA

with violating the penal laws of the Commonwealth of Pennsylvania at [410] 400 EAST PROSPECT AVENUE
/ 229 LOCUST LANE / 310 SOUTH ALLEN STREET, STATE COLLEGE, PA (Subdivision Code) (Place-Political Subdivision)

in CENTRE County

[14]

(County Code)

on or about JANUARY 2023 - NOVEMBER 2024

(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-192-2026	Date Filed: 08/17/2026	OTN/LiveScan Number G 1021127-2	Complaint/ Number	Incident Number BN4240230T
Defendant Name	First: AGOSTINO	Middle: SEBASTIANO	Last: ABBATIELLO	

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.)

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____	
☒	1	911	(B)(4)	of the	TITLE 18
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts
	1	911	(B)(4)	TITLE 18	1
					F-1
PennDOT Data (if applicable)	Accident Number			☐ Interstate	☐ Safety Zone
Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS PA CRIMES CODE TITLE 18 Section 911 (B)(4) The defendant unlawfully conspired with others to violate Section 911(B)(3).					
Acts of the accused associated with this Offense: In that the above named defendant did unlawfully conspire with others to violate Section 911(B)(3) of the Pennsylvania Crimes Code Title 18. To wit: Between the January 2023 and November 2024 the defendant did conspire with with Lars Zeepvat, Shane Devereux, Robert Zanolla, Liam Smith, Thomas Robinson, Mohammed Huraibi, and others to transport and distribute cocaine into Centre County in the Commonwealth of Pennsylvania.					

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☒ Conspiracy 18 903	Number of Victims Age 60 or Older _____	
☐	2	780-113	(A) 30	of the	TITLE 35
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts
	2	780-113	(A) 30	TITLE 35	1
					F
PennDOT Data (if applicable)	Accident Number			☐ Interstate	☐ Safety Zone
Statute Description (include the name of statute or ordinance): CONSPIRACY TO COMMIT THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT; APRIL 1972; TITLE 35; 780113; (a) 30:					
Acts of the accused associated with this Offense: In that the above named defendant did conspire with another(s) to possess with intent to manufacture or deliver, a controlled substance while not being registered under this Act. TO WIT: Between the January 2023 and November 2024, the defendant did conspire with Lars Zeepvat, Shane Devereux, Robert Zanolla, Liam Smith, Thomas Robinson, Mohammed Huraibi, and others to deliver cocaine.					

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____	
☐	3	780-113	(A) 30	of the	TITLE 35
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts
	3	780-113	(A) 30	TITLE 35	1
					F
PennDOT Data (if applicable)	Accident Number			☐ Interstate	☐ Safety Zone
Statute Description (include the name of statute or ordinance): THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT; APRIL 1972; TITLE 35; 780113; (a) 30:					
Acts of the accused associated with this Offense: In that the above named defendant did possess with intent to manufacture or deliver, a controlled substance while not being registered under this Act. TO WIT: Between January 2023 and November 2024, the defendant did possess with the intent to deliver and did deliver cocaine to Lars Zeepvat, Shane Devereux, Andrew Acker, and others.					



POLICE CRIMINAL COMPLAINT

Docket Number: CK-192-2046	Date Filed: 09/17/2024	OTN/LiveScan Number 61021127-2	Complaint Number	Incident Number BN4240230T
Defendant Name	First: AGOSTINO	Middle: SEBASTIANO	Last: ABBATIELLO	

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.)

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____
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☐	4	780-113	(A) 30	of the	TITLE 35	1	F		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number			☐ Interstate	☐ Safety Zone	☐ Work Zone	

Statute Description (include the name of statute or ordinance): THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT; APRIL 1972; TITLE 35; 780113; (a) 30:

Acts of the accused associated with this Offense: In that the above named defendant did possess with intent to manufacture or deliver, a controlled substance while not being registered under this Act. TO WIT: On or about January 2024, the defendant did possess with the intent to delivery and did deliver approximately (6-8) ounces of suspected cocaine to Thomas Robinson in exchange for US currency.

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____
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☐	5	780-113	(A) 30	of the	TITLE 35	1	F		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number			☐ Interstate	☐ Safety Zone	☐ Work Zone	

Statute Description (include the name of statute or ordinance): THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT; APRIL 1972; TITLE 35; 780113; (a) 30:

Acts of the accused associated with this Offense: In that the above named defendant did possess with intent to manufacture or deliver, a controlled substance while not being registered under this Act. TO WIT: On or about February 2024, the defendant did possess with the intent to delivery and did deliver approximately (6-8) ounces of suspected cocaine to Thomas Robinson in exchange for US currency.

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____
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☐	6	780-113	(A) 30	of the	TITLE 35	1	F		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number			☐ Interstate	☐ Safety Zone	☐ Work Zone	

Statute Description (include the name of statute or ordinance): THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT; APRIL 1972; TITLE 35; 780113; (a) 30:

Acts of the accused associated with this Offense: In that the above named defendant did possess with intent to manufacture or deliver, a controlled substance while not being registered under this Act. TO WIT: On or about, 03/19/2024 the defendant did possess with the intent to delivery and did deliver approximately (500) grams of suspected cocaine to Thomas Robinson in exchange for US currency.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-192-2020	Date Filed: 08/17/2020	OTN/LiveScan Number G1021127-2	Complaint Number	Incident Number BN4240230T
Defendant Name	First: AGOSTINO	Middle: SEBASTIANO	Last: ABBATIELLO	

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.)

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	7	780-113	(A) 30	of the	TITLE 35	1	F		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute Description (include the name of statute or ordinance): THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT; APRIL 1972; TITLE 35; 780113; (a) 30:									
Acts of the accused associated with this Offense: In that the above named defendant did possess with intent to manufacture or deliver, a controlled substance while not being registered under this Act. TO WIT: On or about July-12-13 2024, the defendant did possess with the intent to delivery and did deliver approximately (1000) grams of suspected cocaine to Thomas Robinson in exchange for US currency.									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	8	780-113	(A) 30	of the	TITLE 35	1	F		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute Description (include the name of statute or ordinance): THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT; APRIL 1972; TITLE 35; 780113; (a) 30:									
Acts of the accused associated with this Offense: : In that the above named defendant did possess with intent to manufacture or deliver, a controlled substance while not being registered under this Act. TO WIT: On or about September 21, 2024, the defendant did possess with the intent to delivery and did deliver approximately (1000) grams of suspected cocaine to Thomas Robinson in exchange for US currency.									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	9	780-113	(A) 30	of the	TITLE 35	1	F		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute Description (include the name of statute or ordinance): THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT; APRIL 1972; TITLE 35; 780113; (a) 30:									
Acts of the accused associated with this Offense: In that the above named defendant did possess with intent to manufacture or deliver, a controlled substance while not being registered under this Act. TO WIT: On or about November 2024, the defendant did possess with the intent to delivery and did deliver approximately (1000) grams of suspected cocaine to Thomas Robinson in exchange for US currency.									



POLICE CRIMINAL COMPLAINT

Docket Number: CR-192-2024	Date Filed: 08/17/2024	OTN/LiveScan Number G1021127-2	Complaint Number	Incident Number BN4240230T
Defendant Name	First: AGOSTINO	Middle: SEBASTIANO	Last: ABBATIELLO	

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.)

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____
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☐	10	5111	(A) (1)	of the	TITLE 18	1	F-1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
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Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES; PA CRIMES CODE TITLE 18 Section 5111 (A)(1)

Acts of the accused associated with this Offense: The defendant, did conduct a financial transaction(s) with the knowledge the property involved represented the proceeds of unlawful activity and acted with the intent to promote the carrying on of the unlawful activity. To Wit: Between January 2023 and November 2024 the defendant obtained and sold cocaine for profit, then utilized said profits to re-invest said monies to facilitate the additional procurement, distribution and ultimately profit from the sale of cocaine in Centre in the Commonwealth of Pennsylvania.

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____
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☐	11	7512	(A)	of the	TITLE 18	1	F-3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
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Statute Description (include the name of statute or ordinance): CRIMINAL USE OF A COMMUNICATION FACILITY; PA CRIMES CODE TITLE 18 Section 7512(a)

Acts of the accused associated with this Offense: The defendant did use a communication facility to commit, cause or facilitate the commission a felony under the PA Controlled Substance, Drug, Device and Cosmetic Act 64-1972, all of which is in violation of the Title 18 PA CS 7512. To Wit: Between August 2023 and November 2024, the defendant did use the Snapchat Smartphone app to to facilitate the delivery of cocaine to known persons.

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____
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☐				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: CR-192-2026	Date Filed: 08/17/2026	OTN/LiveScan Number G1021127-2	Complaint Number	Incident Number BN4240230T
Defendant Name	First: AGOSTINO	Middle: SEBASTIANO	Last: ABBATIELLO	

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 6.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

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

August 17, 2026
(Date) (Year)

[Signature] 3230
(Signature of Affiant)

AND NOW, on this date August 17, 2026 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.

49-3-02
(Magisterial District Court Number)

[Signature: Kelley Michelle Warner]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR-192-2016	Date Filed: 08/17/2016	OTN/LiveScan Number G1021127-2	Complaint Number	Incident Number BN4240230T
Defendant Name	First: AGOSTINO	Middle: SEBASTIANO	Last: ABBATIELLO	

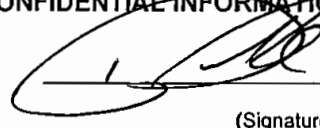
AFFIDAVIT of PROBABLE CAUSE

1. Detective Donald Paul #3230 (hereafter referred to as your affiant), is currently a State College Police Officer and has held that position since April 2005. Your affiant is a member of The Centre County Drug Task Force (CCDTF) and has held that position since November 2007. As a member of the CCDTF, your affiant has authority to investigate and arrest people for violations of The Controlled Substance, Drug, Device and Cosmetic Act in all Judicial Districts throughout the Commonwealth of Pennsylvania (Pennsylvania Title 42 § 8953(a)(3)(iii)). Prior to being employed with the State College Police Department, your affiant was a Police Officer with the Montgomery County Maryland Department of Police for 8 years. Your affiant received law enforcement training, including the investigation and enforcement of drug laws and other investigations, at the Montgomery County Department of Police Training Academy and various law enforcement sponsored training seminars. Your affiant is currently assigned to the State College Police Criminal Investigations Section with a concentration in drug investigations and has held that position since October 2007.

2. During his career, your affiant has received specialized drug law training. As a result of your affiant's training and experience, your affiant has become familiar with and knowledgeable in not only the clandestine manner in which drugs are used, but also the business practices used by drug dealers to include methods of packaging, storing and concealing illegal drugs, prices for which illegal drugs are sold, methods of delivering illegal drugs as well as methods of record keeping and concealment of proceeds from illegal drug sales. Your affiant has also become familiar with and knowledgeable in recognizing behavioral patterns of drug dealers, the manner and methodology by which they communicate, and in interpreting coded language used in the illegal sale of controlled substances.

I, DETECTIVE DONALD PAUL, 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.

 3230
(Signature of Affiant)

Sworn to me and subscribed before me this 17th day of August 2016

08/17/2016 Date Kelley Ann Walker, Magisterial District Judge

My commission expires first Monday of January, 2032





POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE

Docket Number: CR-192-2026	Date Filed: 08/17/2026	OTN/LiveScan Number G1021127-2	Complaint Number	Incident Number BN4240230T
Defendant Name:	First: AGOSTINO	Middle: SEBASTIANO	Last: ABBATIELLO	

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

3. During his career, your affiant has been involved in numerous investigations, arrests, search warrants and prosecutions for drug related crimes. Your affiant has been personally involved in more than 500 drug related investigations, supervised more than 1000 controlled buys of illegal, controlled substances, applied for and/or executed more than 400 search warrants, and has charged more than 500 people for Violations of The Controlled Substance, Drug, Device and Cosmetic Act; specifically for the delivery of controlled substances. Your affiant has interviewed more than 400 people who were personally involved in the trafficking of controlled substances. As a result of your affiant's training and experience, your affiant has become familiar with and knowledgeable in not only the clandestine manner in which drugs are used, but also the business practices used by drug dealers to include methods of packaging, storing and concealing illegal drugs, prices for which illegal drugs are sold, methods of delivering illegal drugs as well as methods of record keeping and concealment of proceeds from illegal drug sales. Your affiant has also become familiar with and knowledgeable in recognizing behavioral patterns of drug dealers, the manner and methodology by which they communicate, and in interpreting coded language used in the illegal sale of controlled substances.

4. The 55th Statewide Investigating Grand Jury, the Office of Attorney General, the State College Police Department, other law enforcement agencies, and your affiants have been conducting a criminal investigation into the suspected violations of the criminal laws of the Commonwealth of Pennsylvania, including violations of the Controlled Substance, Drug, Device, and Cosmetic Act by Agostino Abbatiello, Thomas Robinson, et. Al.

5. The evidentiary results of this investigation and the investigative efforts of the 55th Statewide Investigating Grand Jury are reported in the attached Grand Jury Presentment Number 2 which is attached hereto and made a part of this Affidavit of Probable Cause. Said presentment shows on its face that it is based on evidence that the Grand Jury reviewed and evaluated; that the evidence included sworn testimony of witnesses who appeared before it as well as physical evidence presented to it; and, that the aforementioned Presentment Number 2 was reviewed and approved by the Honorable Edward M. Marsico, Jr., Supervising Judge of the 55th Statewide Investigating Grand Jury, who by Order dated July 31, 2026, directed that the appropriate criminal charges be initiated and prosecuted by the Office of the Attorney General of the Commonwealth of Pennsylvania in Centre County, Pennsylvania. Your affiant has reviewed Presentment Number 2, and your affiant agrees that the findings identified therein correspond with the results of your affiants' own investigation to date.



3230

(Signature of Affiant)

INTRODUCTION

We, the members of the Fifty-Fifth Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to violations of the Pennsylvania Crimes Code and the Controlled Substance, Drug, Device and Cosmetic Act occurring in and around Centre County in Pennsylvania pursuant to Notice of Submission of Investigation No. 2, do hereby make the following findings of fact and recommendation of charges:

FINDINGS OF FACT

The Grand Jury is investigating a case which began in September 2024, wherein Detective Donald Paul ("Det. Paul") of the State College Police Department initiated an investigation into a cocaine distribution ring being operated in State College, Pennsylvania. Early in the investigation, Det. Paul was able to develop confidential informant(s) ("CI") that conducted several controlled purchases of cocaine from an individual whose source was associated with two fraternities at Penn State University—Delta Upsilon and Sigma Chi.

Det. Paul told the Grand Jury that a controlled purchase is a method used to buy illegal drugs using a CI, who is under the "control" of law enforcement. There are several steps used to control the purchase. The CI is searched before and after the purchase to ensure he/she has no money or drugs. Cellular phones are often used to arrange the purchase of controlled substances. The CI is then given pre-recorded money to purchase the drugs. The CI is taken or followed by law enforcement to the location of the drug purchase. After the purchase, the CI returns to law enforcement and the purchased drugs are surrendered to law enforcement. All the suspected drugs are then forwarded to a Pennsylvania State Police (PSP) laboratory for further testing. The CI then provides a statement as to what took place during the purchase.

After several controlled purchases, Det. Paul, along with the State College Police Department, arrested Thomas Robinson ("Robinson"), who was selling cocaine from the fraternity, Delta Upsilon. Robinson was charged with the deliveries to the CI, as well as items seized after a search warrant was executed on his room at the fraternity. A total of six controlled purchases were made from Robinson between September 2024 and December 2024. The drugs were sent to the Pennsylvania State Police Crime Lab for testing. The drugs sold by Robinson were confirmed to be cocaine and the total weight between the controlled purchases and seizure from Robinson's room totaled 73.8 grams of cocaine.¹ After Robinson's arrest, he cooperated with law enforcement and gave information about his source of illegal narcotics. Robinson told police that Agostino Abbatiello ("Abbatiello"), who was a Penn State student and member of the Sigma Chi fraternity, was his source for cocaine.

Robinson explained that he obtained cocaine from Abbatiello on numerous occasions. He detailed six larger transactions that took place between January 2024 and September 2024. The first two purchases of cocaine from Abbatiello were for between six and eight ounces on each transaction. The third purchase took place around March 19, 2024, when Robinson purchased 500 grams from Abbatiello for \$18,000. The date was confirmed using a photo on Robinson's phone, wherein several pledges of Delta Upsilon were assisting Robinson in packaging the cocaine into smaller baggies for distribution. The next larger purchase from Abbatiello was for one kilogram or 1,000 grams of cocaine, for which Abbatiello charged Robinson \$22,000. Robinson's last drug purchase from Abbatiello occurred around September 2024, when he purchased an additional

¹ The first controlled purchase for cocaine was on 9/25/24 and the drugs weighed 2.46 grams. The second controlled purchase was on 9/27/24 and the weight was 13.84 grams. The third controlled purchase was on 10/2/24 and the drugs weighed 14.05 grams. The fourth controlled purchase was on 10/16/25 and the drugs weighed 27.72 grams. The fifth controlled purchase was on 11/14/24 and the drugs weighed 13.74 grams. The sixth controlled purchase was on 12/12/24 and the drugs weighed 7.3 grams. The search warrant was executed on 12/13/24 and the cocaine seized was 5.76 grams.

kilogram of cocaine for \$22,000; the date was confirmed because the sale took place on a weekend of a home football game at Penn State University.

Robinson explained that he first met Abbatiello through Mohammed Huraibi ("Huraibi"). Huraibi was one of Robinson's fraternity brothers at Delta Upsilon. Huraibi first introduced Robinson to cocaine at the fraternity house. Around December 2022, Huraibi first started selling cocaine to other brothers within the house after taking over for another fraternity brother. In July 2023, Huraibi approached Robinson and asked him to become business partners in distributing cocaine. When Robinson and Huraibi returned to school in the Fall of 2023, they started buying drugs together. Initially, Huraibi acquired drugs from Abbatiello, and later he introduced Robinson so that he could purchase directly from Abbatiello.

Huraibi testified before the Grand Jury that in the Fall of 2023, he set up the first purchase of cocaine from Abbatiello using Snapchat, a messaging application on his phone. The agreement was to purchase around 100 grams of cocaine for \$4,000. Robinson and Huraibi both contributed cash for the purchase. Abbatiello brought the drugs to Delta Upsilon and delivered 100 grams of cocaine to Huraibi in exchange for cash. Huraibi's plan for the cocaine was to repackage it in half gram bags to sell for profit. Robinson and Huraibi would both make a commission off the sale of bags of cocaine. Huraibi and Robinson then sold the individual bags to other fraternity members or friends. Robinson and Huraibi would communicate with one another whenever the bags were sold to keep track of their profits.

Huraibi detailed the next purchase that he and Robinson made from Abbatiello in November 2023. He testified that they purchased around 250 grams of cocaine from Abbatiello for around \$7,500. Huraibi stated that he and Robinson split the cost equally and planned to share the profits of the sales. They picked up the drugs from Abbatiello at his apartment in State College,

paid Abbatiello in cash, and took the drugs back to the fraternity for packaging. Several of the pledges at the Delta Upsilon fraternity were used to package the drugs into half gram bags for sale..

Huraibi explained that in December 2023, he told Robinson that he wanted out of the business and didn't want to continue selling cocaine. Huraibi explained that Robinson paid him back the base amount of cash that he contributed to purchasing the most recent supply of drugs and an additional amount for his profit. Huraibi testified that although he was backing out of the business, he continued to sell drugs to Kaden Howe ("Howe"), who was a friend of his and a brother at the fraternity Acacia at Penn State University. Howe purchased smaller amounts for personal use most of the time, but on a few occasions, he purchased larger amounts of cocaine to sell at his fraternity. Another witness that testified before the Grand Jury confirmed that Howe was known to sell cocaine within his fraternity. Once Huraibi distanced himself from the business, Howe continued to purchase cocaine directly from Robinson.

Despite distancing himself from Robinson, Huraibi remained friends with several of the brothers at Delta Upsilon. He also continued to attend parties, including "Molly" parties at the fraternity. A "Molly" party is a themed party where many of the attendees would consume the hallucinogenic drug known as "Molly." Huraibi testified that he supplied Molly to the brothers at the party. Around the time of Spring/Fall 2024, Huraibi was aware that Robinson continued to purchase cocaine from Abbatiello. He detailed one occasion when Huraibi was in Robinson's room at the fraternity and Robinson was discussing that he had just purchased a kilogram of cocaine from Abbatiello. Huraibi explained that he was aware that the drug organization, of which Robinson was a leading member, had gotten larger and the drugs were being distributed to individuals outside of the fraternities.

As the drug business grew, Robinson utilized brothers of the fraternity to assist him in his drug operation. In Fall of 2024, Connor Hurleigh ("Hurleigh") and Michael Brogno ("Brogno"), brothers at Delta Upsilon², assisted Robinson by packaging cocaine and delivering bags of cocaine to individuals for purchase. Additionally, Ryan Matson ("Matson"), who was described as Robinson's best friend, was also an integral part of Robinson's drug distribution network. Matson would assist Robinson in picking up drugs from Abbatiello and in distributing cocaine.

Larz Zeepvat ("Zeepvat") was identified as another business partner of Abbatiello. Zeepvat was a brother at the fraternity Sigma Chi. Zeepvat and Abbatiello were close friends and worked closely together in distributing drugs. Zeepvat explained that he was a cocaine user and when he first came to Penn State, he had a source for cocaine in Philadelphia. He would get cocaine from his source in Philadelphia for himself and some of his fraternity brothers, including Abbatiello. Initially, Zeepvat and Abbatiello were buying between 3.5-7 ounces of cocaine from his Philadelphia source. After a short time, his source would no longer talk to him, so he and Abbatiello sought out a new source. Abbatiello then found a source in his hometown in New York that would supply them with larger amounts of cocaine.

Zeepvat testified that once a source was obtained in New York, around Spring 2023, Abbatiello made a large purchase, for 100 grams of cocaine. Once he made this large purchase, Zeepvat described a shift in Abbatiello, and it was clear to him that Abbatiello was now selling drugs for profit, rather than sourcing it for himself and a few friends. Abbatiello had a conversation with Zeepvat asking him if he wanted to make money and help him distribute cocaine in State

² Two presentments were previously issued by the Fifty-Second Statewide Investigating Grand Jury on September 12, 2025. In those presentments, charges for several other members of the Delta Upsilon fraternity were recommended for the charges of Criminal Conspiracy/Possession with Intent to Deliver, Possession of a Controlled Substance, and Possession of Drug Paraphernalia. Additionally, charges were recommended for Thomas Robinson and Ryan Matson for the crimes of Corrupt Organizations, Criminal Conspiracy/ Possession with Intent to Deliver, and related offenses.

College. Abbatiello branched out from selling cocaine within the fraternity house and extended outside of the house to other fraternities and students.

On another occasion, in Spring 2023, Abbatiello asked Zeepvat and Robert Zanolle ("Zanolle"), another Sigma Chi brother, to make a trip with him to New York to re-up his supply of cocaine. At the time, Zanolle was already purchasing cocaine from Abbatiello. Abbatiello offered Zanolle between \$500-\$1000 to make the trip to get cocaine. Zeepvat stated that Abbatiello paid half the purchase price ahead of the trip and Zanolle paid for the rest in cash. Zeepvat and Zanolle took three trips to purchase large quantities of drugs for Abbatiello. They would drive to a location based on an address given to them from Abbatiello, a man would deliver a bag with cocaine in it to either Zeepvat or Zanolle, and they would return with the bag to State College and give it to Abbatiello. Zeepvat and Zanolle received payment for making the trip from Abbatiello in either cash or a cheaper price for cocaine.

Zeepvat explained that after Abbatiello would get a large supply of cocaine, he would bring the drugs to Sigma Chi and have other brothers and pledges assist him in preparing and packaging the cocaine for resale. Zeepvat testified that Abbatiello was purchasing around 100 grams of cocaine from his source in New York and bringing it back to Penn State every three to six weeks. In Spring 2024, Zeepvat described a time he observed Abbatiello delivering about 500 grams or half of a kilogram of cocaine to Robinson. He believed that the purchase price for the cocaine was \$20,000.

When Zeepvat and Zanolle would return with a supply of cocaine for Abbatiello, he would utilize fraternity brothers, or his roommates, when he later moved to an off-campus apartment, to assist him in cutting up the cocaine and packaging it in smaller amounts to distribute. Abbatiello's roommates in the off-campus apartment were Liam Smith ("Smith") and Alex Erickson

("Erickson"). Smith assisted Abbatiello on at least five occasions in preparing the larger quantity of cocaine for distribution. Smith also purchased cocaine from Abbatiello on at least ten occasions while they were roommates.

Zeepvat stated that during 2023-2024, Abbatiello was the largest distributor of cocaine at Penn State University. He stated that Abbatiello would boast about how much money he was making from selling cocaine. Zeepvat explained Abbatiello loaned him \$1,500, so that he and other fraternity brothers could attend a spring break trip. Zeepvat stated that Abbatiello then made him deliver cocaine for him when he couldn't pay back the loan. Zeepvat detailed other individuals including Andrew Acker ("Acker") who owed Abbatiello thousands of dollars after taking a loan from him. Acker was another individual who was selling cocaine for Abbatiello.

Acker began purchasing cocaine from Abbatiello in late Fall 2023-Spring 2024 after becoming a fraternity brother at Sigma Chi. Acker described Abbatiello as one of the bigger drug dealers at Penn State. Acker began selling cocaine for Abbatiello to make extra cash. Abbatiello would give him small baggies of cocaine to either deliver to specific individuals or to sell on his own and keep a portion of the sale for profit. Acker stated that after Abbatiello had graduated from Penn State in Spring 2024, on one occasion, Acker met Abbatiello mid-way between State College and New York, and he exchanged \$10,000 in cash for between 300 and 500 grams of cocaine. Abbatiello brought the drugs to Acker for him and Zeepvat to distribute at Penn State. Acker explained that he would often use CashApp to pay Abbatiello for the cocaine that he was distributing, and he believed the amount of those transactions to total around \$30,000. In total, though, Acker believes that between cash and digital transactions, he paid Abbatiello over \$50,000 for drugs.

Several witnesses testified before the Grand Jury that they purchased cocaine on numerous occasions from Abbatiello during their time at Penn State between January 2023 and August 2024. Many of the witnesses also either assisted or observed Abbatiello preparing cocaine for sale by cutting it from a larger form to small individual bags for distribution. The consensus among the witnesses that testified before the Grand Jury is that Abbatiello was the main dealer of cocaine at Penn State during this timeframe and he was making considerable amounts of money in the business. Abbatiello has continued to distribute cocaine among his friends, as recently as February 2026. Additionally, when he learned that individuals were being interviewed by law enforcement about drug dealing at Penn State, he begged them not to talk about his involvement.