

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):

MICHAEL

PAUL

BROGNO

JR.

First Name

Middle Name

Last Name

Gen.

8354 ACADEMY ROAD, ELLICOTT CITY, MD 21043

*DEFENDANT NEEDS TO BE PROCESSED*PHONE: (410) 782-1799

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-200-2024	Date Filed 8/17/2024	OTN/LiveScan Number W1020882-2	Complaint Number	Incident Number BN4240230T	Request Lab Services? ☐ YES ☒ NO
GENDER ☒ Male ☐ Female	DOB 11/28/2005	POB	Add'l DOB / /	Co-Defendant(s) ☒	
First Name AKA		Middle Name	Last Name		Gen.
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:					

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 DONALD 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

☐ 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 **[410]** **229 LOCUST LANE, STATE**

COLLEGE, PENNSYLVANIA

(Subdivision Code)

(Place-Political Subdivision)

in **CENTRE** County

[14]

(County Code)

on or about **OCTOBER 2024**

(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CB-200-2024	Date Filed: 8/17/2024	OTN/LiveScan Number W1020882-2	Complaint/ Number	Incident Number BN4240230T
Defendant Name	First: MICHAEL	Middle: PAUL	Last: BROGNO	

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	780-113	(A) 16	of the	TITLE 35	1	M		
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; 780-113; (a) 16:									
Acts of the accused associated with this Offense: The defendant did knowingly or intentionally possess a controlled substance while not being registered or licensed under this Act. TO WIT: During the month of October 2024, the defendant did possess cocaine and delivered cocaine in plastic bags to customers of Thomas Robinson at the direction of Thomas Robinson.									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐	2	780-113	(A) 32	of the	TITLE 35	1	M		
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; 780-113; (a) 32:									
Acts of the accused associated with this Offense: The defendant did use, or possess with intent to use, drug paraphernalia for the purpose of planting, growing, harvesting, manufacturing, compounding, converting, producing, processing, preparing, testing, analyzing, packing, repacking, storing, containing, concealing, injecting, ingesting, inhaling or otherwise introducing into the human body a controlled substance in violation of this Act. To Wit: During the month of October 2024, the defendant did possess cocaine and delivered cocaine in plastic bags to customers of Thomas Robinson at the direction of Thomas Robinson.									

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____					
☐				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	
Statute Description (include the name of statute or ordinance):									
Acts of the accused associated with this Offense:									



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-200-2026</u>	Date Filed: <u>8/17/2026</u>	OTN/LiveScan Number <u>W1020882-2</u>	Complaint Number	Incident Number BN4240230T
Defendant Name	First: MICHAEL	Middle: PAUL	Last: BROGNO	

- 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 3.
- 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)

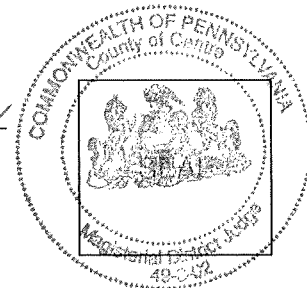
[Signature]
(Signature of Affiant)

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)

Kerley Michelle Warner
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR-200-2024	Date Filed: 8/17/2024	OTN/LiveScan Number W1020882-2	Complaint Number	Incident Number BN4240230T
Defendant Name	First: MICHAEL	Middle: PAUL	Last: BROGNO	

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.

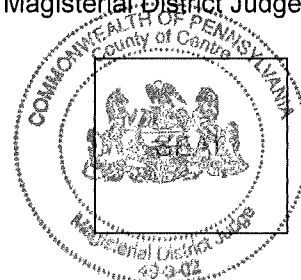
2. During his career, your affiant has received specialized drug law training. As a result of your affiant's training and experience, your affiant has become familiar with and knowledgeable in not only the clandestine manner in which drugs are used, but also the business practices used by drug dealers 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.


(Signature of Affiant)

Filed
Sworn to me and subscribed before me this 17th day of August 2024
08/17/2024 Date Kacey Grette Warner, Magisterial District Judge
My commission expires first Monday of January, 2032





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

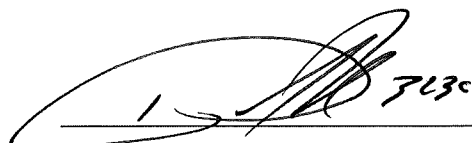
Docket Number: CR-200-2024	Date Filed: 8/17/2024	OTN/LiveScan Number W1020882-2	Complaint Number	Incident Number BN4240230T
Defendant Name:	First: MICHAEL	Middle: PAUL	Last: BROGNO	

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 52nd 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. Marisco Jr., Supervising Judge of the 55th Statewide Investigating Grand Jury, who by Order dated October 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.


(Signature of Affiant)