

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):
MOHAMMED S. HURAIABI
First Name Middle Name Last Name Gen.
272 GRACE AVENUE, SECAUCUS, NJ 07094
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-193-2006	Date Filed 08/17/2006	OTN/LiveScan Number V1021385-1	Complaint Number	Incident Number BN4240230T	Request Lab Services? ☐ YES ☒ NO
GENDER ☒ Male ☐ Female	DOB 08/07/2004	POB	Add'l DOB / /	Co-Defendant(s) ☒	
First Name		Middle Name	Last Name		Gen.
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 8

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)
do hereby state: (check appropriate box)

PA0140300
(Police Agency ORI Number)

FILED/RECEIVED BY
MDJ COURT 49-3-02

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 _____

AUG 17 2006

☐ 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 16801 (Subdivision Code) (Place-Political Subdivision)

in CENTRE County [14] on or about JULY 2003 - NOVEMBER 2003
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-193-2026	Date Filed: 08/17/2026	OTN/LiveScan Number V 1021305-1	Complaint/ Number	Incident Number BN4240230T
Defendant Name	First: MOHAMMED	Middle: S.	Last: HURAIBI	

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	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	
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 2023 the defendant did conspire with with Agostino Abbatiello, Thomas Robinson, and others to 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	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): 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 July 2023 and November 2023, the defendant did conspire with Agostino Abbatiello, Thomas Robinson, 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	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	
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 July 2023 and November 2023 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.									



POLICE CRIMINAL COMPLAINT

Docket Number: CR-193-2024	Date Filed: 08/17/2024	OTN/LiveScan Number V1021305-1	Complaint Number	Incident Number BN4240230T
Defendant Name	First: MOHAMMED	Middle: S.	Last: HURAIBI	

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 _____	
☐	4	7512	(A)	of the	TITLE 18
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts
					1
					F-3
PennDOT Data (if applicable)		Accident Number	☐ Interstate		☐ Safety Zone
			☐ Work Zone		
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 July 2023 and November 2023, 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 _____	
☐	5	780-113	(A) 16	of the	TITLE 35
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts
					1
					M
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: Between the July 2023 and November 2023, the defendant did possess cocaine.					

Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older _____	
☐	6	780-113	(A) 32	of the	TITLE 35
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts
					1
					M
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: Between the July 2023 and November 2023, the defendant did possess cocaine which was packaged in individual bags for sale.					



POLICE CRIMINAL COMPLAINT

Docket Number: CR-193-1024	Date Filed: 08/17/2026	OTN/LiveScan Number V1021385-1	Complaint Number	Incident Number BN4240230T
Defendant Name	First: MOHAMMED	Middle: S.	Last: HURAIBI	

- 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 4.
- 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.)

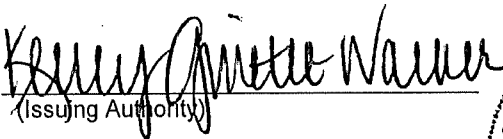
August 17 2026
(Date) (Year)

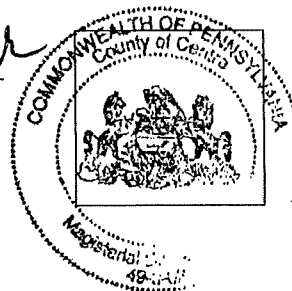
 3230
(Signature of Affiant)

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)


(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-193-2016</i>	Date Filed: <i>08/17/2016</i>	OTN/LiveScan Number <i>V1021385-1</i>	Complaint Number	Incident Number <i>BN4240230T</i>
Defendant Name	First: <i>MOHAMMED</i>	Middle: <i>S.</i>	Last: <i>HURAIBI</i>	

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.

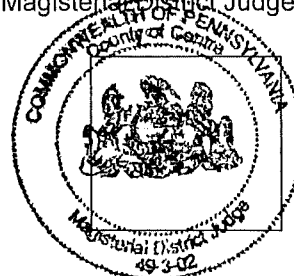
[Signature] 3230
(Signature of Affiant)

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

08/17/2016 Date *Kelley Grotte-Wagner*

My commission expires first Monday of January, *2032*

, Magisterial District Judge





POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE

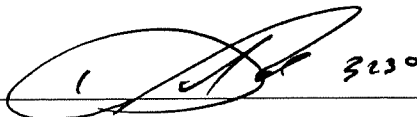
Docket Number: CR-193-2026	Date Filed: 08/11/2026	OTN/LiveScan Number V1021385-1	Complaint Number	Incident Number BN4240230T
Defendant Name:	First: MOHAMMED	Middle: S.	Last: HURAIBI	

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.


(Signature of Affiant)