



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN-7001418T
Defendant Name	First: VERNARD	Middle: W.	Last: MAYO

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	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____			
<input checked="" type="checkbox"/> Lead?	1	911	(B)(3) of the PA CC	1	F		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS							
Acts of the accused associated with this Offense: That the Defendant, Vernard Mayo, during the time period February 14, 2018 through April 17, 2019, in Crawford and Erie Counties, Pennsylvania, while employed by or associated with an enterprise, did conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs, the trafficking of Cocaine, through a pattern of racketeering activity, as defined in Title 18 Pa. C.S. § 911(h)(1), all of which is in violation of Title 18 Pa. C.S. § 911(b)(3).							

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____			
<input type="checkbox"/> Lead?	2	911	(B)(4) of the PA CC	1	F		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS							
Acts of the accused associated with this Offense: SEE ATTACHED OFFENSE DESCRIPTION CONTINUATION PAGE							

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____			
<input type="checkbox"/> Lead?	3	780-113	A30 of the CSDDCA	1	F		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY TO DELIVER COCAINE							
Acts of the accused associated with this Offense: SEE ATTACHED OFFENSE DESCRIPTION CONTINUATION PAGE							



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	780-113	(A)(30)	of the	CSDDCA	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): POSSESSION WITH THE INTENT TO DELIVER COCAINE

Acts of the accused associated with this Offense:
That the Defendant, Vernard Mayo, directly or by virtue of his complicity, did on multiple occasions unlawfully, willfully and feloniously possess with intent to deliver a controlled substance; on February 14, 2018 thru April 17, 2019 located in Crawford and Erie Counties, Pennsylvania, Vernard Mayo, a person not being authorized by law to deliver the controlled substance set forth herein, did feloniously possess with intent to deliver Cocaine, a Schedule II Controlled Substance, in violation of section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 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	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	780-113	(A)(30)	of the	CSDDCA	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): DELIVERY OF COCAINE

Acts of the accused associated with this Offense:
That the Defendant, Vernard Mayo, a person not being authorized by law to deliver the controlled substance set forth herein directly or by virtue of his complicity, on or about February 14, 2018 through April 17, 2019, in Erie and Crawford Counties, Pennsylvania, did deliver Cocaine, a Schedule II Controlled Substance, in violation of Section 13(a)(30) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(30).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	6	5111	(A) 1	of the	PA CC	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY TO DEAL IN PROCEEDS OF UNLAWFUL ACTIVITIES

Acts of the accused associated with this Offense:
SEE ATTACHED OFFENSE DESCRIPTION CONTINUATION PAGE



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 (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.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	7	780-113	(A)(16)	of the	CSDDDCA	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): POSSESSION OF COCAINE

Acts of the accused associated with this Offense:
 That the defendant, Vernard Mayo, directly or by virtue of his complicity, did knowingly or intentionally unlawfully possess a controlled substance, that is on or about February 14, 2018 through April 17, 2019, located in Erie and Crawford Counties, Pennsylvania, Vernard Mayo, a person not being authorized by law to possess the controlled substance set forth herein, did knowingly or intentionally unlawfully possess Cocaine, a Schedule II Controlled Substance, in violation of Section 13 (a)(16) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(16).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	8	780-113	(A)(32)	of the	CSDDDCA	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): USE OF OR POSSESSION WITH INTENT TO USE DRUG PARAPHERNALIA

Acts of the accused associated with this Offense:
 That the defendant, Vernard Mayo did use and/or possess with intent to use drug paraphernalia for the purpose of containing, concealing, ingesting, injecting, inhaling or otherwise introducing into the human body a controlled substance on or about February 14, 2018 through April 17, 2019 located in Erie and Crawford Counties, Pennsylvania, in violation of 13 (a)(32) of the Controlled Substance, Drug, Device and Cosmetic Act, an Act of April 14, 1972, P.L. 233, No. 64, as amended, 35 P.S. § 780-113(a)(32).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	9	5111	(A) 1	of the	PA CC	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES

Acts of the accused associated with this Offense:
 SEE ATTACHED OFFENSE DESCRIPTION CONTINUATION PAGE



**POLICE CRIMINAL COMPLAINT
OFFENSE CONTINUATION PAGE**

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OFFENSE DESCRIPTION CONTINUATION

Offense # 2: Corrupt Organizations

That the Defendant, Vernard Mayo, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a violation of 18 Pa.C.S. § 911(b)(3), that is, on or between February 14, 2018 through April 17, 2019, in Crawford and Erie Counties, Pennsylvania, Vernard Mayo did conspire and agree with Rahman Hooks, James Jenkins, Troy Ogden, James Jones, Aanik Jones, Tommy Howard, Ellis Munson, Tyrone Brown, Dave Walton, Cyndi Walton, Kim Nicholson, Rahim Hooks, Jabril Hooks and others known and unknown that they or one or more of them would conduct or participate, directly or indirectly, while employed by or associated with an enterprise engaged in commerce consisting of trafficking in controlled substances through a pattern of racketeering activity as defined in Title 18 Pa.C.S. § 911(h)(1), all of which is in violation of Title 18 Pa.C.S. § 911(b)(4).

Offense #3: Criminal Conspiracy to PWID/Deliver Cocaine

That the Defendant, Vernard Mayo, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or an attempt or solicitation to commit a crime, that is, on or between February 14, 2018 through April 17, 2019, within Crawford and Erie Counties, Pennsylvania, Vernard Mayo did conspire and agree with Rahman Hooks, James Jenkins, Troy Ogden, James Jones, Aanik Jones, Tommy Howard, Ellis Munson, Tyrone Brown, Dave Walton, Cyndi Walton, Kim Nicholson, Rahim Hooks, Jabril Hooks and others known and unknown that they or one or more of them would engage in conduct constituting the crime of Delivery of or Possession with the Intent to Deliver Cocaine, a Schedule II controlled substance, and in pursuance of such conspiracy one or more overt acts were committed, all of which is in violation of Title 18 Pa.C.S. § 903.

Offense #6: Criminal Conspiracy to Deal in Proceeds of Unlawful Activities

That the Defendant, Vernard Mayo, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or an attempt or solicitation to commit a crime, that is, on or between February 14, 2018 through April 17, 2019, within Crawford and Erie Counties, Pennsylvania, Vernard Mayo did conspire and agree with Rahman Hooks, James Jenkins, Troy Ogden, James Jones, Aanik Jones, Tommy Howard, Ellis Munson, Tyrone Brown, Edith Henderson, Cyndi Walton, Kim Nicholson, Rahim Hooks, Jabril Hooks and others known and unknown that they or one or more of them would engage in conduct constituting Dealing in Proceeds of Unlawful Activities, to include utilizing proceeds from the illegal distribution of Cocaine to finance his lifestyle and his illegal Cocaine distribution organization, in violation of 18 Pa. C.S. A. § 5111(a)(1).



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OFFENSE CONTINUATION PAGE**

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OFFENSE DESCRIPTION CONTINUATION

Offense # 9: Dealing in Proceeds of Unlawful Activities

In that Vernard Mayo, directly or by virtue of his complicity, from February 14, 2018 through April 17, 2019, did conduct financial transactions, with knowledge that the property involved represented the proceeds of unlawful activity, did act with the intent to promote the carrying on of the unlawful activity. TO WIT: Vernard Mayo used proceeds from the illegal distribution of Cocaine to finance his lifestyle and his illegal Cocaine distribution organization, in violation of 18 Pa. C.S. A. § 5111(a)(1).




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Defendant Name	First: VERNARD	Middle: W.	Last: MAYO

- 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 13
- 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.)

5-3 (Date) 2019 (Year)  (Signature of Affiant)

AND NOW, on this date May 3, 2019 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.

3Dth JUDICIAL DISTRICT
(Magisterial District Court Number)


(Issuing Authority) 