

APPENDIX A

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF NORTHAMPTON



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 03-2-06

DEFENDANT: (NAME and ADDRESS)

MDJ: Hon. DANIEL G. CORPORA

MARKEITH JOHN WEBB
First Name Middle Name Last Name Gen.

Address: 210 LINE ST
EASTON, PA 18042

2 MARYLAND CIRCLE
APT. #106
WHITEHALL, PA 18052

Telephone: (610)258-8711

NCIC Extradition Code Type

- | | | | |
|--|---|---|--|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 4-Felony No Ext. | <input type="checkbox"/> 8-Misdemeanor Limited | <input type="checkbox"/> E-Misdemeanor Pending |
| <input type="checkbox"/> 2-Felony Ltd. | <input type="checkbox"/> 5-Felony Pend. | <input type="checkbox"/> C-Misdemeanor Surrounding States | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> Distance: _____ | | | |

DEFENDANT IDENTIFICATION INFORMATION

RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number 20090605M5742
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		DOB 11/01/1975	POB PHILA, PA		
AKA MARKIETH		First Name	Middle Name	Last Name WEBB	Gen.
HAIR COLOR <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green)		<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> RED (Red/Aubn) <input type="checkbox"/> BLN (Blonde / Strawberry) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald)	EYE COLOR <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HZL (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> JNK (Unknown)	
Request Lab Service? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Driver License State PA License Number 26321984	Expires		WEIGHT (lbs.) 225	
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location	FBI Number		MNU Number	HEIGHT In. 5 10
Fingerprint Classification: HAS NOT BEEN FINGERPRINTED					

DEFENDANT VEHICLE INFORMATION

Plate # GRS0114	State PA	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY) 00/08	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code
VIN 1G1ND52J3XY132090	Year 1999	Make CHEVROLET	Model MALIBU	Style	Color GREEN	

Office of the attorney for the Commonwealth Approved Disapproved because: _____

(The attorney for the Commonwealth may require the complaint, arrest warrant affidavit, or both, be approved by the attorney for the Commonwealth prior to filing. See PA.A.Crim P 507).

(Name of the attorney for the Commonwealth-Please Print or Type) _____ (Signature of the attorney for the Commonwealth) _____ (Date) _____

I, DET JOE ALONZO 1034/
(Name of the Affiant) PSP/MPOETC -Assigned/ Affiant ID Number & Badge #
of EASTON POLICE DEPARTMENT PA0480400
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state:

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 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 [302] CITY OF EASTON
LAFAYETTE AMBASSADOR BANK 280 LINE ST EASTON, PA 18042 (Subdivision Code) (Place/Political Subdivision)

in NORTHAMPTON County [48] on or about 5 JUNE 2009 AT 1057 HRS.
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complain/Incident Number 20090605M5742
Defendant Name	First: MARKEITH	Middle: JOHN	Last: WEBB

- 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.C. 4904) relating to unsworn falsification to authorities.
- This complaint is comprised of the preceding Page, as well as the attached pages that follow, numbered 3 through 7 , specifying the offenses and Participants, if any.

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 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.)

_____ (Date) _____ (Signature of Affiant)

AND NOW, on this 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.

03-2-06
(Magisterial District Court Number) _____ (Issuing Authority)



POLICE CRIMINAL COMPLAINT

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Defendant Name	First: MARKEITH	Middle: JOHN	Last: WEBB

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate: (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) 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	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A	
<input checked="" type="checkbox"/> Lead?	1	3701	A1	of the	18	1	F1	/901
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		

Acts of the accused associated with this Offense:
ROBBERY, Title 18 PACC Sec. 3701(a)(1)(ii) (F-1); A person is guilty of robbery if, in the course of committing a theft, he: threatens another with or intentionally puts him in fear of immediate serious bodily injury; To Wit the Defendant did enter the Lafayette Ambassador Bank, 280 Line St., displayed a handgun, threatened the employees of the bank with the handgun, and did remove \$4,665.00 in US Currency from two teller stations.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A	
<input type="checkbox"/> Lead?	2	2702	A1	of the	18	1	F1	/901
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		

Acts of the accused associated with this Offense:
AGGRAVATED ASSAULT, Title 18 PACC Sec. 2702(a)(1) (F-1); A person is guilty of aggravated assault if he: attempts to cause serious bodily injury to another, or causes such injury intentionally, knowingly or recklessly under circumstances manifesting extreme indifference to the value of human life; To Wit the Defendant did enter the Lafayette Ambassador Bank, 280 Line St., displayed a handgun, threatened the employees of the bank with serious bodily injury, and did remove \$4,665.00 in US Currency from two teller stations.



POLICE CRIMINAL COMPLAINT

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AFFIDAVIT of PROBABLE CAUSE

1. I, Det. Joseph Alonzo, am a sworn police officer for the City of Easton. I am currently assigned as a detective in the department's Criminal Investigation Division. On June 5th, 2009 I was assigned to investigate a bank robbery.
2. On June 5th, 2009 at approximately 1058 hours the Easton Police Department responded to the Lafayette Ambassador Bank, 280 Line St. Easton, Pa., for a bank robbery that just occurred. While investigating the robbery officers learned that the suspect displayed a handgun and fled the bank with an undetermined amount of money. While the suspect was removing money from the bank he also removed two of the dye packs from two separate money drawer. As the suspect fled the bank the tellers inside the bank observed one of the dye packs go off spraying red dye in the area of the suspect.
3. Officers reviewed the surveillance video from the bank and learned the suspect was a black male wearing a white t-shirt, a dark colored long sleeve shirt underneath the white t-shirt, gray sweat pants, a blue and orange baseball hat, and did display a black handgun.
4. On this same date officers contacted the news media and requested that they place on the newscast and into the newspapers the description of the suspect along with the fact the dye pack containing red dye had gone off in the suspect's hands and this information did appear on the news and in the newspapers.
5. On June 6th, 2009 the manager, Therry Schwartz, of the Square One Exxon located at 1503 Northampton St. Easton, Pa. had contacted the Northampton County 911 center advising that he had money with what appeared to be red dye on the bills. Upon speaking with Schwartz he stated that he was counting the money dropped into his safe on June 5th, 2009 and found six \$50.00 bills and three \$20.00 bills with what appeared to be red dye on each. Schwartz had read

I, DET JOE ALONZO (1034), BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FORGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____,

_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,





POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE

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AFFIDAVIT of PROBABLE CAUSE CONTINUATION

in the newspaper about the robbery and the dye pack going off.

6. Officers took custody of that money and also learned that the money was used in the store on June 5th, 2009 at approximately 1330 hours. This affiant obtained the video surveillance from the store and saw that a black male entered the store and approached the clerk. This clerk was identified as Josie Soriano. Inspector Matthew Gerould of our department interviewed Soriano who stated that she knew this male by his nickname, "Pip." When he entered the store the male asked if he could exchange some \$50.00 bills for smaller denominations. Soriano agreed and exchanged the money for him. The male requests a few more times if he could exchange more money and Soriano does so finally before telling "Pip" that she cannot keep doing this. Soriano noticed that this money had what appeared to be red dye on each of the bills. Inspector Gerould knew that the nickname "Pip" is used by a Markeith Webb. A photo array was conducted with Soriano containing Webb's photo and Webb was identified by Soriano as the same male who entered the store and passed the money with red dye on all the bills.

7. Upon returning to the station officers searched the video surveillance from the Square One Exxon and saw that Webb arrived at the store driving a green Chevrolet Malibu. This affiant researched prior incidents and learned that Webb was stopped by Easton Police on April 28th, 2008 operating a similar green Chevrolet Malibu owned by Webb's girlfriend, Sheina Marie Holmes. This affiant also learned that the registration on the vehicle was issued by Pennsylvania, the number being GRS0114, and listed to an address of 2 Maryland Circle Whitehall, PA.

8. On June 7th, 2009 Inspector Gerould responded to 2 Maryland Circle at approximately 0645 hours and located that same vehicle (a green Chevrolet Malibu bearing PA registration GRS0114). Upon looking at the vehicle he noticed that the vehicle did have what appeared to be red dye in the passenger compartment. The red dye was clearly visible from the outside of the vehicle and contrasted with the tan interior of the vehicle. Inspector Gerould also contacted Markeith Webb on this date at apartment 106 2 Maryland Circle. Markeith Webb was interviewed on this date. Webb admitted that he was driving the above green Chevrolet Malibu on the south side of the city at the time of the robbery. Webb also admitted that he did exchange money with red dye on the bills at the Square One Exxon, 1503 Northampton St., on the date of the robbery and that the same red dye did get into the interior of the Chevrolet Malibu. Webb also advised that he believed that the money with the red dye was possibly stolen from the bank but denied participating in the robbery. A search warrant was obtained for the Chevrolet and it was transported to our secure evidence garage on June 7th, 2009.

9. On June 8th, 2009 this affiant and Inspector Gerould responded to the Lafayette Ambassador Bank to speak with the employees once again and show them a photo array containing Webb. Upon arrival officers made contact with Shaprese Thomas and showed her the photo array containing Webb. Thomas looked over the array and identified Webb as the male who entered the bank, displayed a handgun, threatened to shoot the employees, and robbed the bank of money.

10. Based on the above stated information, I respectfully request that an arrest warrant be issued for the defendant so that he may appear in court to answer the above stated charges.

 (Signature of Affiant)

CONFIDENTIAL



**Law Enforcement NCIC
Information Data Entry Form**

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NCIC Cautions and Medical Conditions (check up to 5)				
<input type="checkbox"/> 00	<input type="checkbox"/> 20	<input type="checkbox"/> 50	<input type="checkbox"/> 70	<input type="checkbox"/> 01 - Other
<input type="checkbox"/> 05	<input type="checkbox"/> 25	<input type="checkbox"/> 55	<input type="checkbox"/> 80	
<input type="checkbox"/> 10	<input type="checkbox"/> 30	<input type="checkbox"/> 60	<input type="checkbox"/> 85	
<input type="checkbox"/> 15	<input type="checkbox"/> 40	<input type="checkbox"/> 65	<input type="checkbox"/> 90	

Scars, Marks, Tattoos (NCIC Codes)	
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