

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF BUCKS



**POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA**

VS.

Magisterial District Number: **07-1-04**
MDJ: Hon. **ROBERT L. WAGNER, JR.**
7325 NEW FALLS ROAD
Address: **LEVITTOWN, PA 19055**
Telephone: **(215) 943-9414**

DEFENDANT: (NAME and ADDRESS):
JERMAINE MICHAEL JACKSON
First Name Middle Name Last Name Gen
360 PENNINGTON AVE APT 404
TRENTON NJ 08618

NCIC Extradition Code Type

- 1-Felony Full
- 2-Felony Ltd.
- 3-Felony Surrounding States
- 4-Felony No Ext
- 5-Felony Pend.
- A-Misdemeanor Full
- B-Misdemeanor Limited
- C-Misdemeanor Surrounding States
- D-Misdemeanor No Extradition
- E-Misdemeanor Pending
- Distance:

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number 11-27375	SID: 362-30-64-9	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 05/09/1992	POB NJ	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>	
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			
HAIR COLOR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk/Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
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"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
Driver License	State PA	License Number 29991593	Expires:	WEIGHT (Lbs.) 165	
DNA	<input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	Ft. HEIGHT In. 5 11		
FBI Number 746651KD8	MNU Number	Defendant Fingerprinted: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
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-Please Print or Type) (Signature of the attorney for the Commonwealth) (Date)

I, **BEIDLER, GREG - MO10395A** **MO10395A 32**
(Name of the Affiant-Please Print or Type) PSP/MPOETC -Assigned Affiant ID Number and Badge #
of **BRISTOL TWP POLICE** **PA0090300**
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

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 [101] **BRISTOL TOWNSHIP**
(Subdivision Code) (Place-Political Subdivision)

17 CRABTREE DRIVE, LEVITTOWN, BUCKS CO.

in BUCKS County [09] on or about **DEC. 28, 2011 2206 HRS**
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

- 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 is comprised of the preceding page, as well as the attached pages that follow, numbered ____ through ____.

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.)**

_____, _____
 (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.

 (Magisterial District Court Number) (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

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) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§213.1-213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
<input checked="" type="checkbox"/>	1	2501	(a)	of the	PA Crimes Code	1	F-1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if Applicable)	Accident Number					<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (Include the Name of the Statute or Ordinance): 18 Pa. C.S. § 903(a)1 Criminal Conspiracy									

Acts of the accused associated with this Offense:

PACC 903(a)1 Criminal Conspiracy

IN THAT, on or about said date, with intent of promoting or facilitating the crime of Homicide, THE DEFENDANT did conspire and agree with Danasia Bakr, Tatyana Henderson, Kazair Gist, and Breon Powell that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of shooting and killing Daniel DeGennaro, in violation of Section 903(a)(1) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
<input type="checkbox"/>	2	2501	(a)	of the	PA Crimes Code	1			
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if Applicable)	Accident Number					<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (Include the Name of the Statute or Ordinance): 18 Pa. C.S. § 2501(a) Criminal Homicide									

Acts of the accused associated with this Offense:

18 Pa. C.S. § 2501(a) Criminal Homicide

IN THAT, on or about said date, THE DEFENDANT did intentionally, knowingly, recklessly, or negligently cause the death of Daniel DeGennaro, another human being, in violation of Section 2501(a) of the PA Crimes Code. (18 P.S. 2501(a))



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

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) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§213.1-213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
<input type="checkbox"/> Lead?	3	3701	(a)(1)(i)	of the	PA Crimes Code	1	F-1		
PennDOT Data (if Applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (Include the Name of the Statute or Ordinance): PACC 903(a)1 Criminal conspiracy F-1				

Acts of the accused associated with this Offense:

PACC 903(a)1 Criminal Conspiracy

IN THAT, on or about said date, with intent of promoting or facilitating the crime of Robbery, THE DEFENDANT did conspire and agree with Danasia Bakr, Tatyana Henderson, Kazair Gist and Breon Powell, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of entering victim Daniel DeGennaro's home with the intent to take money at gun point, in violation of Section 903(a)(1) of the PA Crimes Code.

<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						
<input type="checkbox"/> Lead?	4	3701	(a)(1)(i)	of the	PA Crimes Code	1	F-1		
PennDOT Data (if Applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (Include the Name of the Statute or Ordinance): PACC 3701(a)(1)(i) Robbery F1				

Acts of the accused associated with this Offense:

PACC 3701(a)(1)(i) Robbery F1

IN THAT, on or about said date, THE DEFENDANT, in the course of committing a theft, namely, an armed invasion of victim Daniel DeGennaro's home, did inflict serious bodily injury upon Daniel DeGennaro by shooting him in the chest, in violation of Section 3701(a)(1)(i) of the PA Crimes Code. Felony-1st.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

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) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§213.1-213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
<input type="checkbox"/> Lead?	5	3502	(a)	of the	PA Crimes Code	1	F-1		
PennDOT Data (if Applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone					
Statute Description (Include the Name of the Statute or Ordinance): PACC 903(a)1 Criminal conspiracy									

Acts of the accused associated with this Offense:

PACC 903(a)1 Criminal Conspiracy F-1

IN THAT, on or about said date, with intent of promoting or facilitating the crime of Burglary, THE DEFENDANT did conspire and agree with Danasia Bakr, Tatyana Henderson, Kazair Gist, and Breon Powell, that they or one or more of them would engage in conduct constituting such crime or crimes, and in furtherance thereof did commit the overt act of entering the home of Daniel DeGennaro to obtain money at gun point, in violation of Section 903(a)(1) of the PA Crimes Code.

<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						
<input type="checkbox"/> Lead?	6	3502	(a)	of the	PA Crimes Code	1	F-1		
PennDOT Data (if Applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone					
Statute Description (Include the Name of the Statute or Ordinance): PACC 3502(a) Burglary F1									

Acts of the accused associated with this Offense:

PACC 3502(a) Burglary F1

IN THAT, THE DEFENDANT did on or about said date, enter a building or occupied structure or separately secured or occupied portion thereof, namely, the home of Daniel DeGennaro at 17 Crabtree Drive Levittown, with the intent to commit a crime therein, at a time when the premises were not open to the public and THE DEFENDANT was not privileged or licensed to enter, in violation of Section 3502 (a) of the PA Crimes Code. Felony-1st.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

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) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§213.1-213.7.)

<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						
<input type="checkbox"/>	7	907	(a)	of the	PA Crimes Code	1	M-1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> PennDOT Data (if Applicable)	Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (Include the Name of the Statute or Ordinance): PACC 907(a) Possessing Instrument of Crime M1									

Acts of the accused associated with this Offense:

PACC 907(a) Possessing Instrument of Crime M1

IN THAT, on or about said date, THE DEFENDANT did possess an instrument of crime, namely, a shotgun and a handgun, with intent to employ it criminally, in violation of Section 907(a) of the PA Crimes Code (18 P.S. 907(a) - Misd. 1st)



**Confidential Information Form
Criminal Complaint**

Complete the defendant's SSN Information if known. If this form is submitted as part of a Criminal Complaint, the NCIC Cautions/Medical Conditions and Scars/Marks/Tattoos should also be completed if known.

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

NCIC Cautions and Medical Conditions (Check up to 9)				
<input type="checkbox"/> 00	<input type="checkbox"/> 20	<input type="checkbox"/> 50	<input type="checkbox"/> 70	<input type="checkbox"/> 01
<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	

Confidential Information	
Name: JACKSON, JERMAINE MICHAEL	Social Security Number: 154-92-1383
<input checked="" type="checkbox"/> Defendant	Financial Information:
<input type="checkbox"/> Other: _____	

Please provide the following information for each co-defendant



Co-Defendant Data Sheet

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

Complaint/Incident Number 11-27375	Co-Defendant # <u>1</u>
DANASIA AMEENA BAKR	
(Name)	
250 PLAZA BLVD	
(Home Street Address)	
MORRISVILLE, PA 19067	(609) 533-5313
(City, State & ZIP Code)	(Telephone #)

Complaint/Incident Number 11-27375	Co-Defendant # <u>2</u>
TATYANA NIKIA HENDERSON	
(Name)	
2517 DUNKSFERRY RD	
(Home Street Address)	
BENSALEM, PA 19020	(267) 304-4103
(City, State & ZIP Code)	(Telephone #)

Complaint/Incident Number 11-27375	Co-Defendant # <u>3</u>
BREON POWELL	
(Name)	
148 W HANOVER STREET	
(Home Street Address)	
TRENTON, NJ 08618	
(City, State & ZIP Code)	(Telephone #)

Complaint/Incident Number 11-27375	Co-Defendant # <u>4</u>
KAZAIR GIST	
(Name)	
608 MARTIN LUTHER KING BLVD	
(Home Street Address)	
TRENTON, NJ 08618	
(City, State & ZIP Code)	(Telephone #)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

AFFIDAVIT OF PROBABLE CAUSE

Your Affiants are Detective Greg Beidler from the Bristol Township Police Department and Detective Timothy Perkins from the Bucks County District Attorney's Office. Detective Greg Beidler has been employed as a Police Officer in Bristol Township for twenty-three years. For the last sixteen years, Detective Beidler has been assigned to the Criminal Investigation Division. While employed in Bristol Township, Detective Beidler has been involved in homicide investigations as well as numerous investigations of other violent crimes that include attempted homicide, aggravated assault, robbery and rape. Detective Timothy Perkins has been employed as a Detective with the Bucks County District Attorney's Office since January 2011. Prior to working at the Bucks County District Attorney's Office, Detective Perkins was employed with the Bristol Township Police Department for thirteen years, with nine of those years assigned to the Criminal Investigation Division where he held the rank of Detective. During his career in Bristol Township Detective Perkins has had similar experience in investigating crimes of violence to include homicide, attempted homicide, robbery, aggravated assault, and rape. He is authorized to conduct criminal investigations and to make arrests throughout the county of Bucks for all criminal offenses.

On December 28, 2011, at approximately 10:06 PM, witness Nick Wilson contacted the Bucks County Emergency Communication Center for a fall victim, reportedly with "blood all over" at 17 Crabtree Drive, Levittown, PA in Bristol Township, Bucks County, PA. Bristol Township Police Officers Doug Slemmer and Kim Caron were dispatched to the call. While en route they were advised by the 911 operator that the victim had a hole in his stomach that was possibly a gunshot wound.

Bristol Township Police Officer Doug Slemmer arrived on scene at 10:09 PM and was approached by Nick Wilson in the driveway of 17 Crabtree Drive. Wilson was yelling "you gotta get in here he's shot." Officer Slemmer walked to the front door of 17 Crabtree Drive and found the victim, Daniel DeGennaro, lying on the foyer floor on his back. The victim appeared deceased and was unresponsive. Officer Slemmer also observed a fired 9mm shell casing on the kitchen floor. No firearm was located in the area where the victim was found or the stairs or the second level kitchen.

The Levittown Fairless Hills rescue squad responded to the scene and transported the victim to Saint Mary's Hospital, where the victim was pronounced dead at 10:41 PM by the emergency room Physician, Dr. Joan Gable. On December 30, 2011, a post mortem examination was conducted at the Bucks County Morgue by Dr. Erica Williams. Dr. Williams determined that the cause of death was a gunshot wound to the chest. Dr. Williams opined that the manner of death was homicide.

Bristol Township Police Detective Jack Slattery spoke to witness Nick Wilson who stated that on Wednesday, December 28, 2011, at approximately 9:30 PM, he received a telephone call on his cellular telephone from what he believed was a black female who Wilson described as "ghetto sounding." The caller I.D. from Wilson's phone indicated that the call was placed from telephone number (267) 304-4103. The female was calling regarding a 2007 black Volkswagen Jetta that Wilson had for sale directly behind Daniel DeGennaro's property at 17 Crabtree Drive along Levittown Parkway. The vehicle was just outside the fence and gate at the end of the defined driveway leading from the rear yard of 17 Crabtree Drive out onto Levittown Parkway. Wilson's telephone number and the asking price was posted on a for sale sign placed in the window of the



POLICE CRIMINAL COMPLAINT

AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

Volkswagen Jetta. Wilson stated that the female was adamant on taking the vehicle for a test ride immediately, though it was 9:30 P.M. at night. Wilson informed the female that he was in bed for the evening. He instructed the female to call him back on the following morning

Your affiants received subscriber and call detail record for this telephone number. T-Mobile records listed the subscriber of telephone number (267) 304-4103 to be the mother of Defendant Tatyana Henderson. The call detail records on December 28, 2011, at 9:30 P.M. shows that an outgoing call was placed to Nick Wilson's cellular telephone number. The cell tower that telephone number (267) 304-4103 acquired to complete this cellular telephone call was located on Levittown Parkway, just outside of the Crabtree Section of Levittown, about 300 yards away from the crime scene, indicating that the caller was in the immediate area at the time the call was placed.

Upon reviewing the call detail record for T-Mobile telephone number (267)304-4103, your affiants noted that there were forty-four incoming and outgoing text messages between T-Mobile telephone number (267) 304-4103 and Metro PCS telephone number (609)-533-5313. These text message range in time from 8:56:38 PM to 9:52:42 PM, on December 28, 2011, ending just before the shooting that occurred at about 10:00 PM. Another text message was sent from T-Mobile telephone number (267) 304-4103 to Metro PCS number (609) 533-5313 at 10:24:54 PM, which is about eighteen minutes after Nick Wilson's 911 call reporting the shooting at 17 Crabtree Drive.

Your affiants received requested records for Metro PCS cellular telephone number (609) 533-5313 on January 6, 2012. Metro PCS records listed defendant Danasia Bakr as the subscriber to Telephone number (609) 533-5313. Your Affiants also received call detail record for Danasia Bakr's cellular telephone. These call detail records showed that on December 28, 2011, Danasia Bakr's telephone acquired a cellular telephone tower located at 200 Magnolia Drive, Levittown, Pa. which is about 1000 yards from the scene of the murder. This tower was acquired 4 times on December 28, 2011, between 9:42 PM and 9:56 PM. These acquisitions occurred within 23 minutes prior to the 10:06 PM call dispatch time for the homicide. Upon further review of the text message communications between Danasia Bakr and Tatyana Henderson, on the afternoon of December 28, 2011, prior to the murder, Tatyana Henderson sent Danasia Bakr a text message asking "can we go do that thing wit Jermaine.."

Danasia Bakr's call detail record shows that she also had two outgoing calls and three incoming calls from AT&T telephone number (717) 825-3255 between 9:36 P.M. and 9:56 P.M. on December 28, 2011. These calls were made just prior to the murder of Daniel DeGennaro. At 10:05 P.M., just after the murder of Daniel DeGennaro, Danasia Bakr placed another outgoing call to AT&T telephone number (717) 825-3255. At 10:10 P.M. Danasia Bakr received an incoming call from AT&T telephone number (717) 825-3255.

Your affiants obtained AT&T subscriber and call detail records for telephone number (717) 825-3255. The subscriber for this telephone is defendant Jermaine Jackson. Jackson's call detail record shows that between 9:36 P.M. and 9:56 P.M. on December 28, 2011, just minutes before the murder of Daniel DeGennaro, his cellular telephone was "handing off" from one tower to another tower as signal strength decreased between the



POLICE CRIMINAL COMPLAINT

AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

handset and the tower. One of these towers is located to the east of the crime scene and the other is located to the west of the crime scene. Both towers provide overlapping coverage of the crime scene and are roughly equidistant from the crime scene.

On March 8 and March 21, 2012, your affiants interviewed Danasia Bakr. During these interviews, Danasia Bakr admitted her involvement in the murder of Daniel DeGennaro. Danasia Bakr stated that she and Tatyana Henderson were asked by Jermaine Jackson to follow him from Trenton to Bristol where he was going to "get money."

On December 28, 2011, Danasia Bakr and Tatyana Henderson drove to Trenton New Jersey and met up with Jermaine Jackson, Breon Powell, and "Dough" in a lot near the Candlelight Bar in Trenton. Danasia Bakr subsequently identified Kazair Gist to be the person she knows as "Dough." Jackson said that they were going to a guy's house that owed him money. Jackson wanted to go and try and get the money but if there was any problem Jackson was going to have Powell come in and hold the guy at gunpoint until the guy gave Jackson the money. When they left the Trenton lot, Breon Powell drove his car with Jermaine Jackson in the front passenger seat and Kazair Gist in the rear seat. Danasia Bakr followed in her car with Tatyana Henderson in the front passenger seat. Bakr followed Powell's car from Trenton to the victim's Crabtree neighborhood.

While driving around Crabtree for an estimated 20 to 30 minutes they ended up on Levittown Parkway a few times, driving past a 2007 black Volkswagen for sale parked on the Parkway that was for sale. Jackson got out of Powell's car and got into Danasia Bakr's car. Bakr assumed the role of lead car while Breon Powell and Kazair Gist followed in the second car.

As they approached the Volkswagen again, Jackson told her to pull over because he wanted to look at the car, which was backed up to a gate behind a house. Danasia Bakr pulled over and parked in the grass near the Volkswagen. Breon Powell pulled over and stopped behind Bakr's vehicle. Danasia Bakr explained that from where they were, they could see through the window of the house where the car was. Danasia Bakr saw two people in the house. Although Jackson never got out of the car, he could also see the people in the house from inside the car. Jackson told Tatyana Henderson to get out and go call about the Volkswagen, which she did while Jackson and Bakr stayed in the car. Breon Powell accompanied Henderson as she stood by the Volkswagen and called the number listed on the "for sale" sign on its window. Jackson wanted to see if "the people that were in the window" at the house they were parked behind, would answer the phone when Henderson called.

After placing the call, Tatyana Henderson returned to Danasia Bakr's car as Breon Powell returned to his car. They drove through the same neighborhood again as Jermaine Jackson was looking for the house. They ended up on "Crabtree Street," but before they got to the end of the street where the house was, Jackson told her to stop. Danasia Bakr stopped in the middle of the street and Breon Powell stopped behind her. Jackson got out of the car and retrieved Breon Powell's gym bag from Danasia Bakr's trunk. Jackson took Powell's gym bag and walked it back to Powell's car and then returned to Danasia Bakr's car. Jackson then directed Bakr to



POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 11-27375
Defendant Name	First: JERMAINE	Middle: MICHAEL	Last: JACKSON

AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

park down around the corner just past the house.

After going over the plan discussed previously in the Trenton lot, Jackson exited the car and walked in the direction they had just drove from. Tatyana Henderson also exited the car. Henderson walked to the front of the car and then crossed in front of Bakr's car. Bakr stated that Henderson returned to the car about twenty minutes later. When Henderson returned, Bakr asked her where she had been. Henderson told her that she was on the phone with Jackson because Jackson wanted Henderson to stay on the phone with him until he got into the house.

Bakr and Henderson were in the car when Bakr heard a loud gunshot followed by a second gunshot that was not as loud as the first. When she heard the gunshots, she started her car and started to pull away. Breon Powell and Kazair Gist ran up behind them and started pounding on her trunk. Bakr stopped the car and opened her trunk. Powell put his bag back in Bakr's trunk. Powell and Gist then jumped into the rear seat of Bakr's car. As they got into Bakr's car, both Powell and Gist were wearing gloves and Gist had a ripped pair of pantyhose over his face. After getting into the car, Breon Powell said "I had to do it" because the guy had charged at him. Gist was saying that he shot him too. Bakr, Henderson, Powell, and Gist returned to their initial meeting spot at the Trenton lot. When they returned to the lot, Jackson was waiting for them in Powell's car. When Powell exited Bakr's car, he removed a shotgun from his pant leg. Bakr saw Powell take the shotgun apart and place it in his gym bag that he had retrieved from Bakr's trunk.

Based on the above facts and circumstances your affiants request that a warrant for arrest be issued.

I, BEIDLER, GREG - MO10395A, 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.

(Signature of Affiant)

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

_____ Date _____, Magisterial District Judge

My commission expires first Monday of January,

