



VS.

Magisterial District Number: **07-1-04**

DEFENDANT:

(NAME and ADDRESS):

MDJ: Hon. **TERRENCE P. HUGHES SR.**
7325 NEW FALLS ROAD
LEVITTOW, PA 19055

MATTHEW

JAMES

BYRNE

First Name

Middle Name

Last Name

Gen

Address:
Telephone: **215-943-9414**

29
BROOMALL

FERGUSON AVE

PA

19008

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: **CR-130-24** Date Filed: **08/05/24** OTN/LiveScan Number: **E1006744-4** Complaint: **319** Incident Number: **99-24-0433** Request Lab Services? YES NO

GENDER: Male Female
 DOB: **01/17/1981** POB: _____ Add'l DOB: _____ Co-Defendant(s):
 AKA: _____ First Name: _____ 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: **241030RB9** MNU Number: _____ HEIGHT (Ft. In.): **265**

Defendant Fingerprinted: YES NO

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).

THOMAS GANNON

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

08/02/2024

(Date)

I, **JARROD EISENHAUER** (Name of the Affiant) **9931/9937/846/4586** (PSP/MPOETC -Assigned Affiant ID Number and Badge #)

of **Bucks County Detectives** (Identify Department or Agency Represented and Political Subdivision) **PA0094800** (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)

BUCKS COUNTY, PENNSYLVANIA

in **BUCKS** County [**09**] on or about **Between 01/01/2024 and 07/18/2024**
 (County Code) (Offense Date)

Docket Number: CR-130-24	Date Filed: 08/05/2024	OTN/LiveScan Number E10010744-4	Complaint 319	Incident Number 99-24-0433
Defendant Name	First: MATTHEW	Middle: JAMES	Last: BYRNE	

2. 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.

3. 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.

4. This complaint consists of the preceding page(s) numbered 1 through 60.

5. 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.)

JARROD EISENHAUER / BREAN BIELECKE / SHANN MCCLESTER / JOHN AGNEW

 08/05/2024 (Date) _____ (Signature of Affiant) 4586

AND NOW, on this date 08/05/2024 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.

07-1-04
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR-130-24	Date Filed: 08/05/2024	OTN/LiveScan Number E100 6744-4	Complaint 319	Incident Number 99-24-0433
Defendant Name	First: MATTHEW	Middle: JAMES	Last: BYRNE	

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 _____
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<input checked="" type="checkbox"/> Lead?	1	911	B2	of the	18	1	F1		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

Corrupt Org-Int/Control In Enterp

Acts of the accused associated with this Offense:

Corrupt Organizations

(a) Findings of fact.--The General Assembly finds that:

- (1) organized crime is a highly sophisticated, diversified, and widespread phenomenon which annually drains billions of dollars from the national economy by various patterns of unlawful conduct including the illegal use of force, fraud, and corruption;
- (2) organized crime exists on a large scale within the Commonwealth of Pennsylvania, engaging in the same patterns of unlawful conduct which characterize its activities nationally;
- (3) the vast amounts of money and power accumulated by organized crime are increasingly used to infiltrate and corrupt legitimate businesses operating within the Commonwealth, together with all of the techniques of violence, intimidation, and other forms of unlawful conduct through which such money and power are derived;
- (4) in furtherance of such infiltration and corruption, organized crime utilizes and applies to its unlawful purposes laws of the Commonwealth of Pennsylvania conferring and relating to the privilege of engaging in various types of business and designed to insure that such businesses are conducted in furtherance of the public interest and the general economic welfare of the Commonwealth;
- (5) such infiltration and corruption provide an outlet for illegally obtained capital, harm innocent investors, entrepreneurs, merchants and consumers, interfere with free competition, and thereby constitute a substantial danger to the economic and general welfare of the Commonwealth of Pennsylvania; and
- (6) in order to successfully resist and eliminate this situation, it is necessary to provide new remedies and procedures.

(b) Prohibited activities.--

- (2) It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise.

Docket Number: CR-130-24	Date Filed: 08/05/2024	OTN/LiveScan Number E1006744-4	Complaint 319	Incident Number 99-24-0433
Defendant Name	First: MATTHEW	Middle: JAMES	Last: BYRNE	

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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <small>18 901 A</small>	<input type="checkbox"/> Solicitation <small>18 902 A</small>	<input type="checkbox"/> Conspiracy <small>18 903</small>	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	Offense # 2	Section 780-113	Subsection A30	of the	PA Statute (Title) 35	Counts 12	Grade F	NCIC Code	UCR/NIBRS Code
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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 the statute or ordinance):

Manufacture, Delivery, or Possession With Intent to Manufact

Acts of the accused associated with this Offense:

The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, delivered, cocaine and methamphetamine, a controlled substance, in violation of Section 13(a) (30) of the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, 35 P.S. -780-113(a) (30), as amended. The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, possessed, cocaine and methamphetamine, a controlled substance, with the intent to deliver to another



POLICE CRIMINAL COMPLAINT

Docket Number: CR-130-24	Date Filed: 08/05/2024	OTN/LiveScan Number E1006744-4	Complaint 319	Incident Number 99-24-0433
Defendant Name	First: MATTHEW	Middle: JAMES	Last: BYRNE	

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.

<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	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	3	780-113	A30	of the	35	1	F		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

Manufacture, Delivery, or Possession With Intent to Manufacture or Deliver

Acts of the accused associated with this Offense:

The actor with the intent of promoting or facilitating the crime of delivery of a controlled substance and possession of a controlled substance with the intent of deliver conspired and agreed to aid Ralph Brooks, Joseph Byrne, Khalik Kemp, Chaz Harness-Walker, and Christian Garwood in the planning or commission of the aforesaid crime(s) or of an attempt or solicitation to commit such crime(s), and in furtherance thereof committed one or more of the following overt acts: delivery of a controlled substance and possession of a controlled substance with he intent to deliver, in violation of Section 903 (a) (2) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -903 (a) (2), as amended. The actor with the intent of promoting or facilitating the crime(s) charged above, conspired and agreed with Ralph Brooks, Joseph Byrne, Khalik Kemp, and Christian Garwood that they or one or more of them would engage in conduct constituting such crime(s) or attempt or solicitation to commit such crime(s), and in furtherance thereof did as a principal or an accomplice, commit one or more of the following overt acts: delivery of a controlled substance and possession of a controlled substance , in violation of Section 903 (a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S.-903 (a)(1), as amended.

The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, delivered, cocaine and methamphetamine, a controlled substance, in violation of Section 13(a) (30) of the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, 35 P.S. -780-113(a) (30), as amended. The actor, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, Act of April 14, 1972, nor a practitioner registered or licensed by the appropriate State Board, possessed, cocaine and methamphetamine, a controlled substance, with the intent to deliver to another



POLICE CRIMINAL COMPLAINT

Docket Number: CR-130-24	Date Filed: 08/05/2024	OTN/LiveScan Number E1006744-7	Complaint 319	Incident Number 99-24-0433
Defendant Name	First: MATTHEW	Middle: JAMES	Last: BYRNE	

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.

<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?	Offense # 4	Section 5111	Subsection A1	of the	PA Statute (Title) 18	Counts 1	Grade F1	NCIC Code	UCR/NIBRS Code
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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 the statute or ordinance):
Deal In Proc Unl Act/Intent To Promote

Acts of the accused associated with this Offense:
The actor, knowing that the property involved in a financial transaction represented the proceeds of an unlawful activity, namely deliver of a controlled substance and possession of a controlled substance with the intent to distribute conducted a financial transaction which involved the proceeds of unlawful activity with intent to promote the carrying on of the unlawful activity and/or knowing that the transaction was designed in whole or in part to conceal or disguise nature, location, source, ownership or control of the proceeds of unlawful activity and/or to avoid a transaction reporting requirement under State or Federal law, in violation of Section 5111 of the Pennsylvania Crimes Code, Act 108(1) of 1989, 18 Pa. C.S. 5111.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-130-24	Date Filed: 08/05/2024	OTN/LiveScan Number E10012744-4	Complaint 319	Incident Number 99-24-0433
Defendant Name	First: MATTHEW	Middle: JAMES	Last: BYRNE	

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.

<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	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	5	5111	A1	of the	18	1	F1		
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

Deal In Proc Unl Act/Intent To Promote

Acts of the accused associated with this Offense:

The actor with the intent of promoting or facilitating the crime of dealing in unlawful proceeds conspired and agreed to aid Ralph Brooks, Joseph Byrne, Khalik Kemp, Chaz Harness-Walker, and Christian Garwood in the planning or commission of the aforesaid crime(s) or of an attempt or solicitation to commit such crime(s), and in furtherance thereof committed one or more of the following overt acts: dealing in unlawful proceeds, in violation of Section 903 (a) (2) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -903 (a) (2), as amended. The actor with the intent of promoting or facilitating the crime(s) charged above, conspired and agreed with Ralph Brooks, Christian Garwood, Joseph Byrne, Khalik Kemp that they or one or more of them would engage in conduct constituting such crime(s) or attempt or solicitation to commit such crime(s), and in furtherance thereof did as a principal or an accomplice, commit one or more of the following overt acts: dealing in unlawful proceeds, in violation of Section 903 (a)(1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S.-903 (a)(1), as amended. The actor, with the intent of promoting or facilitating the crime(s) of dealing in unlawful proceeds conspired and agreed with Ralph Brooks, Christian Garwood, Joseph Byrne, Khalik Kemp that they or one or more of them would engage in conduct constituting such crime(s) or an attempt or solicitation to commit such crime(s), and in furtherance thereof committed one or more of the following overt acts: ~dealing in unlawful proceeds, in violation of Section 903 (a) (1) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -903 (a)(1), as amended.

The actor, knowing that the property involved in a financial transaction represented the proceeds of an unlawful activity, namely deliver of a controlled substance and possession of a controlled substance with the intent to distribute conducted a financial transaction which involved the proceeds of unlawful activity with intent to promote the carrying on of the unlawful activity and/or knowing that the transaction was designed in whole or in part to conceal or disguise nature, location, source, ownership or control of the proceeds of unlawful activity and/or to avoid a transaction reporting requirement under State or Federal law, in violation of Section 5111 of the Pennsylvania Crimes Code, Act 108(1) of 1989, 18 Pa. C.S. 5111.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-130-24	Date Filed: 08/05/2024	OTN/LiveScan Number E1000744-4	Complaint 319	Incident Number 99-24-0433
Defendant Name	First: MATTHEW	Middle: JAMES	Last: BYRNE	

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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"/>	6	7512	A	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

Criminal Use Of Communication Facility

Acts of the accused associated with this Offense:

The actor used a communication facility to commit, cause, or facilitate the commission or the attempted commission of a crime constituting a felony under Title 18 of the Pennsylvania Crimes Code, or a felony under the Controlled Substance Drug Device and Cosmetic Act namely, operating a drug trafficking organization in possession of a controlled substance with the intent to distribute and the delivery of a controlled substance, in violation of Section 7512 of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C. S.- 7512, as amended.

Docket Number: CR-130-24	Date Filed: 08/05/2024	OTN/LiveScan Number: E1006744-21	Complaint: 319	Incident Number: 99-24-0433
Defendant Name:	First: MATTHEW	Middle: JAMES	Last: BYRNE	

AFFIDAVIT OF PROBABLE CAUSE

See Attachment A

BRIAN BILLOCKE / SHAWN McLESTER / JOHN AGNEW
 I, JARROD EISENHAUER, 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.

Sworn to me and subscribed before me this 5TH day of AUGUST 2024
08/05/2024 Date *[Signature]*
 My commission expires first Monday of January, 2028

