

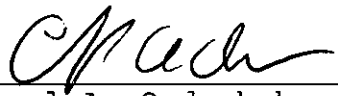
IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PENNSYLVANIA
CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA :
VS. :
\$603.00 U.S. CURRENCY :
AND :
COMMONWEALTH OF PENNSYLVANIA :
VS. :
ONE (1) SIEMENS CELLULAR PHONE :

06-06667

TO THE CLAIMANT OF THE WITHIN DESCRIBED PROPERTY:

You are required to file an answer to this Petition, setting forth your title in, and right to possession of, said property, within thirty (30) days from the service hereof. You are also notified that if you fail to file said answer a decree of forfeiture and condemnation will be entered against such property.

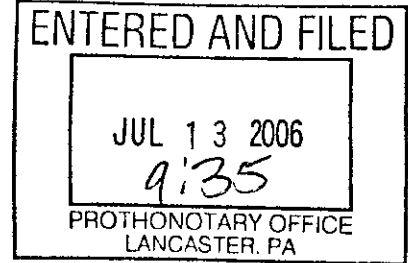


Cheryl A. Ondechek
Assistant District Attorney

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01-06-06dd67



PETITION FOR FORFEITURE

TO THE HONORABLE, THE JUDGES OF THE SAID COURT:

The Petition of Donald R. Totaro, District Attorney of Lancaster County, by Cheryl A. Ondechek, Assistant District Attorney, respectfully requests the Court to order a forfeiture of the following property:

1. The property seized was \$603.00 in United States Currency and one (1) Siemens Cellular Phone, Serial #S30880-S5880-U300-1.

2. The property was seized at approximately 5:55 p.m. on May 17, 2005 in the 100 block of North Charlotte Street, Lancaster, Pennsylvania.

3. The owner of the property is Jabron Michael Taylor.

4. The person in possession of the property at the time of seizure was Jabron Michael Taylor.

5. The property is subject to forfeiture pursuant to Section 6801(A) of the Judicial Code, 42 Pa.C.S.A. 6801(A), based upon the following averment of material facts:

06-06667

On or about May 17, 2005, at approximately 5:30 p.m., an Undercover Detective with the Lancaster County Drug Enforcement Task Force made arrangements to purchase ½ ounce of crack cocaine for \$500.00 in United States Currency from Jabron Taylor. Jabron Taylor told the Undercover Detective to go to North Charlotte and West Orange Street, Lancaster, Pennsylvania, and call him when he arrived.

At approximately 5:47 p.m., the Undercover Detective parked his vehicle in the 100 block of North Charlotte Street. At approximately 5:53 p.m., Jabron Taylor arrived in the area and got into the Undercover Detective's vehicle. He reached into his right pocket, pulled out a bag containing a white chunky substance, and handed it to the Undercover Detective.

The Undercover Detective immediately realized that it was not cocaine and attempted to open the bag. Jabron Taylor became agitated. He stated that he never "ripped him off before", took the bag, opened it and handed it back to the Undercover Detective. The Undercover Detective again stated that he did not believe it was really cocaine. Jabron Taylor struck the Undercover Detective in the groin, forcefully took the \$500.00 Buy Money and fled from the vehicle.


Arrest Officers chased Jabron Taylor and placed him under arrest. During a search, Officers located and seized the \$500.00 in Buy Money, an additional \$103.00 in United States Currency, and

one (1) Siemens Cellular Phone. Subsequently, Jabron Taylor was charged with Aggravated Assault and Delivery of a Non-Controlled Substance. On February 13, 2006, he pled guilty to Simple Assault and Delivery of a Non Controlled Substance. 06-06867

WHEREFORE, the Commonwealth of Pennsylvania respectfully requests Your Honorable Court to issue an Order of Forfeiture that the property be adjudged forfeited to the Commonwealth and condemned, and that it be disposed of according to law.

Respectfully submitted,

OFFICE OF THE DISTRICT ATTORNEY



Cheryl A. Ondechek
Assistant District Attorney

COMMONWEALTH OF PENNSYLVANIA :
: COUNTY OF LANCASTER :

Cheryl A. Ondechek, Assistant District Attorney, being duly affirmed according to law, deposes and says that the facts set forth in the foregoing Motion are true and correct to the best of her knowledge, information and belief.

Cheryl A. Ondechek
Cheryl A. Ondechek
Assistant District Attorney
Attorney ID #38903

Sworn and subscribed
before me this 11th day
of July, 2006.

Diane W. Robinson

NOTARIAL SEAL
DIANE W. ROBINSON, Notary Public
Lancaster, Lancaster County, PA
My Commission Expires Sept. 30, 2007