



OFFICE OF THE DISTRICT ATTORNEY
Adams County Courthouse
117 Baltimore Street, Room 301
Gettysburg, Pennsylvania
17325

BRIAN. R. SINNETT
DISTRICT ATTORNEY

PHONE (717)337-9840
FAX (717)334-3859

*****PRESS RELEASE***PRESS RELEASE***PRESS RELEASE*****

**FOR IMMEDIATE RELEASE
June 18, 2020**

**Contact: Brian R. Sinnett, District Attorney
Adams County
Office (717)337-9840**

**FORMER COUNSELOR AND OTHERS CHARGED FOR INTRODUCTION OF
CONTRABAND TO ADAMS COUNTY PRISON**

Adams County District Attorney Brian Sinnett announced today that a former drug counselor at the Adams County Adult Correctional Complex, Kody Fuller, as well as others, has been charged for actions relating to the introduction and delivery of controlled substances to inmates at the Adams County Adult Correctional Complex. Fuller, 25, of Thomasville, Pennsylvania, was charged by Trooper Cameron Beck of the Pennsylvania State Police with Delivery of a Controlled Substance, Suboxone, as well as Introduction of Contraband, Criminal Conspiracy, and Criminal Use of a Communication Facility. *See attached Criminal Complaint and Affidavit of Probable Cause.* Also charged was inmate Terrence Pearsall, 24, of Harrisburg, Pennsylvania for the same offenses, as well as Greta Hashani, 24, of Harrisburg, Pennsylvania.

District Attorney Sinnett commended the work of the Pennsylvania State Police and officials at the Adams County Adult Correctional Complex in the initial discovery and thorough investigation of this matter. District Attorney Sinnett commented, "It is simply unconscionable that someone employed at the jail to counsel and rehabilitate inmates suffering from drug addictions and problems would take the outrageous step of illegally introducing controlled substances into a correctional facility. There is simply no tolerance for that behavior, and it will be dealt with to the fullest extent provided by law."

All three defendants were arraigned by Magisterial District Judge Matthew Harvey and preliminary hearings have been scheduled for June 24, 2020.

In these cases, as with all criminal cases, the defendants are presumed innocent until proven guilty.

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Preliminary Hearing Notice

Mag. Dist. No: MDJ-51-3-01
MDJ Name: Honorable Matthew Robert Harvey
Address: 525 Boyds School Road
Suite 900
Gettysburg, PA 17325
Telephone: 717-334-7913

Commonwealth of Pennsylvania
v.
Kody Samuel Fuller

Adams County District Attorney's Office
Adams County Courthouse
111-117 Baltimore Street
Gettysburg, PA 17325

Docket No: MJ-51301-CR-0000306-2020
Case Filed: 6/18/2020
Comp/Cit #: PA2020570496
OTN: U 884458-1

Your Role: District Attorney

Charge(s)	
35 § 780-113 §§ A30 (Lead)	Manufacture, Delivery, or Possession With Intent to Manufacture or Deliver
18 § 5123 §§ A	Contraband/Controlled Substance
18 § 903	Conspiracy - Contraband/Controlled Substance

A Preliminary Hearing has been scheduled for the above captioned case to be held on/at:

Date: Wednesday, June 24, 2020	Place: Magisterial District Court 51-0-01, Gettysburg Adams County Human Services Buidling Courtroom, Suite 700 525 Boyds School Road Gettysburg, PA 17325 717-337-9846
Time: 2:45 PM	

Comments: Suite 900

Notice To Defendant

A complaint has been filed charging you with the offense(s) set forth above and on the attached copy of the complaint. If you fail to appear at the time and place above without cause, you will be deemed to have waived your right to be present at any further proceedings before the Magisterial District Judge and the case will proceed in your absence. If any of the charges against you are held for court, a request for a bench warrant against you will be transmitted to the Court of Common Pleas.

At the preliminary hearing you may:

1. Be represented by counsel;
2. Cross-examine witnesses and inspect physical evidence offered against you;
3. Call witnesses on your behalf other than witnesses to testify to your good reputation only, offer evidence on your behalf and testify;
4. Make written notes of the proceeding, or have your counsel do so, or make a stenographic, mechanical, or electronic record of the proceedings.

If the case is held for court and if you fail to appear without cause at any proceeding for which your presence is required, including trial, your absence may be deemed a waiver of your right to be present, and the proceeding, including the trial, may be conducted in your absence.

If you cannot afford to hire an attorney, one may be appointed to represent you. Please contact the office of the Magisterial District Judge for additional information regarding the appointment of an attorney. If you have any questions, please call the above office immediately. Should you fail to appear for your preliminary hearing, a warrant will be issued for your arrest.

June 18, 2020

Date

The Honorable Matthew Harvey



If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation. You can make case payments online through Pennsylvania's Unified Judicial System web portal. Visit the portal at <https://ujportal.pacourts.us/epay> to make a payment.



All Charge(s)

35 § 780-113 §§ A30 (Lead)

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

18 § 5123 §§ A

Contraband/Controlled Substance

18 § 903

Conspiracy - Contraband/Controlled Substance

18 § 7512 §§ A

Criminal Use Of Communication Facility



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: ADAMS



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

Magisterial District Number: 51-3-01
 MDJ Name: Hon. MATTHEW R. HARVEY
 Address: 525 BOYDS SCHOOL RD
 SUITE 900,
 GETTYSBURG, PA 17325
 Telephone: 717-334-7913

DEFENDANT: (NAME and ADDRESS):
 KODY SAMUEL FULLER
 First Name Middle Name Last Name Gen.
 6175 LINCOLN HWY W,
 THOMASVILLE, PA 17364
 717-781-7271

NCIC EXTRADITION CODE TYPE

- | | | | |
|------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------|-----------|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pend. | <input type="checkbox"/> C-Misdemeanor Surrounding States | Distance: |
| <input type="checkbox"/> 2-Felony Ltd. | <input type="checkbox"/> 6-Felony Pend. Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending | |
| <input type="checkbox"/> 4-Felony No Ext. | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition Determ. | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CR 306-20 Date Filed: 6-18-20 OTN/LiveScan Number: U884458-1
 Complaint/Incident Number: PA2020-570496 Request Lab Services? YES NO

GENDER: Male Female
 DOB: 11/24/94 POB: PA 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 / Auburn) 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: MNU Number: Ft. HEIGHT in.:
 Defendant Fingerprinted: YES NO
 Fingerprint Classification: 5 9

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		<input type="checkbox"/>

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, Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. CAMERON BECK

(Name of Affiant - Please Print or Type)

00700187/12249

(PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania State Police, Troop H, Gettysburg

(Identify Department or Agency Represented and Political Subdivision)

PAPSP3100

(Police Agency ORI Number)

do hereby state: (check appropriate box)

- 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 is 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: 219 45 MAJOR BELL LN (ADAMS COUNTY PRISON),
 (Subdivision Code) STRABAN TWP.,
 (Place-Political Subdivision)

in ADAMS County 01 on or about 04/13/20, APPROXIMATELY 0833 HOURS
 (County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 306-20</i>	Date Filed: <i>6-18-20</i>	OTN/LiveScan Number <i>U88LL4581</i>	Complaint/Incident Number PA2020-570496
Defendant Name	First: KODY	Middle: SAMUEL	Last: FULLER

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: 0
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<input type="checkbox"/> Lead?	1	780-113	(a)(30)	of the	Title 35 , C.S.D.D.C.A.	1	F	18()/35A
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):
The Controlled Substance, Drug, Device and Cosmetic Act: Prohibited Acts; Penalties

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver suboxone and marijuana, a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to Terrence PEARSALL, an inmate at Adams County Prison, in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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: 0
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<input type="checkbox"/> Lead?	4	7512	(a)	of the	Title 18 , PA Crimes Code	1	F3	260/90Z
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):
CRIMINAL USE OF COMMUNICATION FACILITY

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted thereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every instance where the communication facility is utilized constitutes a separate offense under this section.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CL 306-20</i>	Date Filed: <i>6/18/20</i>	OTN/LiveScan Number <i>U884458-1</i>	Complaint/Incident Number PA2020-570496
Defendant Name	First: KODY	Middle: SAMUEL	Last: FULLER

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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Number of Victims Age 60 or Older: 0

<input type="checkbox"/> Lead?	2	5123		of the	Title 18 , PA Crimes Code	1	F2		/
	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):
Contraband

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did sell, give, transmit or furnish to any convict in a prison, or inmate in a mental hospital, or give away in or bring into any prison, mental hospital, or any building appurtenant thereto, or on the land granted to or owned or leased by the Commonwealth or county for the use and benefit of the prisoners or inmates, or put in any place where it may be secured by a convict of a prison, inmate of a mental hospital, or employee thereof, any controlled substance included in The Controlled Substance, Drug, Device and Cosmetic Act w/o a written permit signed by the physician of such institution, specifying the quantity/quality of the substance which may be furnished to any convict, inmate, or employee in the prison or mental hospital, the name of the prisoner, inmate, or employee for whom, and the time when the same may be furnished, which permit shall be delivered to and kept by the warden or superintendent of the prison or mental hospital. TO WIT: The defendant did give Suboxone, a Schedule III controlled substance, to Terrence PEARSALL, an inmate at the Adams County Prison.

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: 0

<input type="checkbox"/> Lead?	3	5123		of the	Title 18 , PA Crimes Code	1	F2		/
	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/Engage - Contraband

Acts of the accused associated with this Offense:
PA CRIMES CODE 903(a)(1)/5123(a) IN THAT, on or about said date, THE DEFENDANT, with the intent of promoting or facilitating the crime of Controlled Substance Contraband to Confined Persons Prohibited, did conspire and agree with Terrence PEARSALL and Greta HASHANI that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof, did commit the act(s) of giving Suboxone, a Schedule III controlled substance, to Terrence PEARSALL, an inmate at the Adams County Prison



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CA 306-20</u>	Date Filed: <u>6-18-20</u>	OTN/LiveScan Number <u>U8844581</u>	Complaint/Incident Number PA2020-570496
Defendant Name	First: KODY	Middle: SAMUEL	Last: FULLER

- 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 4
- 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.)

JUNE 18, 2020
(Date)

T.M. Co CA
(Signature of Affiant)

AND NOW, on this date, June 18, 2020 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.

57-3-01
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 306-20</i>	Date Filed: <i>06/18/20</i>	OTN/LiveScan Number: <i>U884658-1</i>	Complaint/Incident Number PA2020-570496
Defendant Name:	First: KODY	Middle: SAMUEL	Last: FULLER

AFFIDAVIT of PROBABLE CAUSE

Your affiant is a member of the Pennsylvania State Police and is assigned to the Criminal Investigations Unit at the Gettysburg Barracks. I have been employed by the Pennsylvania State Police since February 2013. My current assignment involves investigating misdemeanor/felony offenses which are alleged to have occurred in Adams County, PA.

On 04/24/20, approximately 1550 hours, PSP Gettysburg received a call from Warden Katy HILEMAN with the Adams County Prison (ACP). Warden HILEMAN reported an employee at ACP was bringing illegal contraband into the prison and was giving illegal contraband to an inmate. Warden HILEMAN identified the employee as Kody FULLER who was a drug treatment specialist at the prison. FULLER was responsible for counseling inmates with substance abuse problems. The ACP inmate was identified as Terrence PEARSALL.

On 04/24/20, approximately 1234 hours, Warden HILEMAN interviewed FULLER at ACP. During the interview, FULLER admitted to speaking with PEARSALL about bringing suboxone and marijuana into the prison. FULLER related that he met PEARSALL's girlfriend on 04/12/20 somewhere near route 30 in York, PA where she gave him a package containing the above items. PEARSALL's girlfriend was identified as Greta HASHANI. On 04/13/20, FULLER took the package containing illegal contraband and entered ACP where he gave the package to PEARSALL. FULLER claimed this was the only time he took illegal contraband into the prison.

CONTINUED:

I, TPR. CAMERON BECK, 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.

TPR. C. Beck

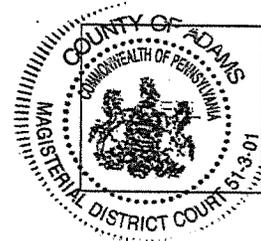
(Signature of Affiant)

Sworn to me and subscribed before me this 10th day of June 2020

06/10/2020 Date

Magisterial District Judge

My commission expires first Monday of January, 2021





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CL306.20</i>	Date Filed: <i>4.18.20</i>	OTN/LiveScan Number: <i>U8844581</i>	Complaint/Incident Number PA2020-570496
Defendant Name:	First: KODY	Middle: SAMUEL	Last: FULLER

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 04/24/20, FULLER's office at ACP and his backpack were searched by ACP staff after FULLER provided verbal consent. During the search, a container of "fake urine" with a temperature gauge, handwarmers to keep the urine warm, and two pocketknives were located. During the interview with Warden HILEMAN, FULLER admitted the container of urine was for passing drug tests.

On 04/24/20, approximately 1800 hours, I was informed by Warden HILEMAN that PEARSALL's cell was just searched and "13" suspected "suboxone strips" were located in the waistband of PEARSALL's sweatpants.

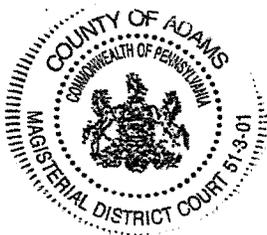
On 05/05/20, approximately 1621 hours, I interviewed FULLER at PSP Gettysburg. During the interview, FULLER was represented by his attorney and acknowledged the interview was going to be audible and visually recorded. During the interview, FULLER claimed that PEARSALL found out that he had a problem smoking weed and threatened to have him drug tested by ACP if he didn't bring him suboxone and marijuana. FULLER admitted to meeting PEARSALL's girlfriend, Greta HASHANI, in York, PA. FULLER admitted to receiving a package containing illegal contraband from HASHANI which he then took into ACP and gave to PEARSALL. FULLER admitted to receiving approximately \$200.00 for the transaction.

On 04/13/20, approximately 0833 hours, FULLER is observed on ACP video surveillance taking PEARSALL into the counseling room where FULLER admitted to giving PEARSALL a package containing illegal contraband.

During this investigation, numerous recorded ACP phone calls, letters, and ACP emails were reviewed between PEARSALL and his girlfriend, Greta HASHANI. The conversations contained several messages involving drug activity which including drug type, packaging, money, and plans for delivery.

CONTINUED:

[Handwritten signature]
06/18/2020



[Handwritten signature]

(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CL 306-20</i>	Date Filed: <i>6/18/20</i>	OTN/LiveScan Number: <i>U8844581</i>	Complaint/Incident Number PA2020-570496
Defendant Name:	First: KODY	Middle: SAMUEL	Last: FULLER

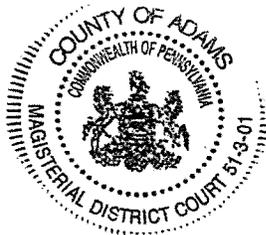
AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 06/15/20, approximately 1305 hours, I interviewed Greta HASHANI at PSP Gettysburg. During the interview, HASHANI was represented by her attorney and acknowledged the interview was going to be audible and visually recorded. HASHANI admitted to meeting FULLER in York, PA. HASHANI admitted to packaging suboxone and marijuana which she gave to FULLER. However, HASHANI related that FULLER told her the he was going to repackage the items before he took them into the prison. HASHANI acknowledged all the recorded messages between her and PEARSALL. HASHANI also provided all the text messages between her and FULLER. The messages involved drug activity, showed FULLER being a willing participant, and provided instructions to HASHANI about where to meet FULLER in York, PA.

On 06/16/20, approximately 0945 hours, I interviewed an inmate (source of information) at ACP. The inmate admitted to purchasing suboxone from PEARSALL. According to the inmate, each strip of suboxone was sold for \$100-120 using a cash app.

Based on the aforementioned, I respectfully request that the Defendant, Kody FULLER, be brought to this court to answer to these charges.

[Handwritten Signature]
06/18/2020



[Handwritten Signature]

(Signature of Affiant)



Preliminary Hearing Notice

Mag. Dist. No: MDJ-51-3-01
MDJ Name: Honorable Matthew Robert Harvey
Address: 525 Boyds School Road
Suite 900
Gettysburg, PA 17325
Telephone: 717-334-7913

Commonwealth of Pennsylvania
v.
Terrence R. Pearsall

Adams County District Attorney's Office
Adams County Courthouse
111-117 Baltimore Street
Gettysburg, PA 17325

Docket No: MJ-51301-CR-0000307-2020
Case Filed: 6/18/2020
Comp/Cit #: PA2020570496
OTN: U 884473-2

Your Role: District Attorney

Charge(s)	
35 § 780-113 §§ A30 (Lead)	Manufacture, Delivery, or Possession With Intent to Manufacture or Deliver
18 § 5123 §§ A	Contraband/Controlled Substance
18 § 903 §§ A1	Criminal Conspiracy Engaging - Contraband/Controlled Substance

A Preliminary Hearing has been scheduled for the above captioned case to be held on/at:

Date: Wednesday, June 24, 2020	Place: Magisterial District Court 51-0-01, Gettysburg Adams County Human Services Building Courtroom, Suite 700 525 Boyds School Road Gettysburg, PA 17325 717-337-9846
Time: 11:00 AM	

Comments: Video

Notice To Defendant

A complaint has been filed charging you with the offense(s) set forth above and on the attached copy of the complaint. If you fail to appear at the time and place above without cause, you will be deemed to have waived your right to be present at any further proceedings before the Magisterial District Judge and the case will proceed in your absence. If any of the charges against you are held for court, a request for a bench warrant against you will be transmitted to the Court of Common Pleas.

At the preliminary hearing you may:

1. Be represented by counsel;
 2. Cross-examine witnesses and inspect physical evidence offered against you;
 3. Call witnesses on your behalf other than witnesses to testify to your good reputation only, offer evidence on your behalf and testify;
 4. Make written notes of the proceeding, or have your counsel do so, or make a stenographic, mechanical, or electronic record of the proceedings.
- If the case is held for court and if you fail to appear without cause at any proceeding for which your presence is required, including trial, your absence may be deemed a waiver of your right to be present, and the proceeding, including the trial, may be conducted in your absence.

If you cannot afford to hire an attorney, one may be appointed to represent you. Please contact the office of the Magisterial District Judge for additional information regarding the appointment of an attorney. If you have any questions, please call the above office immediately. Should you fail to appear for your preliminary hearing, a warrant will be issued for your arrest.

June 18, 2020

Date

The Honorable Matthew Harvey



If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation. You can make case payments online through Pennsylvania's Unified Judicial System web portal. Visit the portal at <https://ujportal.pacourts.us/epay> to make a payment.



All Charge(s)

35 § 780-113 §§ A30 (Lead)

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

18 § 5123 §§ A

Contraband/Controlled Substance

18 § 903 §§ A1

Criminal Conspiracy Engaging - Contraband/Controlled Substance

18 § 7512 §§ A

Criminal Use Of Communication Facility



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ADAMS



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 51-3-01
MDJ Name: Hon. MATTHEW R. HARVEY
Address: 525 BOYDS SCHOOL RD
SUITE 900,
GETTYSBURG, PA 17325
Telephone: 717-334-7913

DEFENDANT: (NAME and ADDRESS):
TERRENCE R PEARSALL
First Name Middle Name Last Name Gen.
2011 FORSTER ST
HARRISBURG, PA 17103

NCIC EXTRADITION CODE TYPE

- | | | | |
|------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------|-----------|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pend. | <input type="checkbox"/> C-Misdemeanor Surrounding States | Distance: |
| <input type="checkbox"/> 2-Felony Ltd. | <input type="checkbox"/> 6-Felony Pend. Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending | |
| <input type="checkbox"/> 4-Felony No Ext. | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition Determ. | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CR. 307-20 Date Filed: 6/18/20 OTN/LiveScan Number: U034H132
Complaint/Incident Number: PA2020-570496 Request Lab Services? YES NO

GENDER: Male Female
DOB: 06/12/96 POB: PA 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 / Auburn.) 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.): 235

FBI Number: 698307AE4 MNU Number: Ft. HEIGHT In.: 6 1

Defendant Fingerprinted: YES 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. Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. CAMERON BECK

(Name of Affiant - Please Print or Type)

00700187/12249

(PSP/MP/OTEC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania State Police, Troop H, Gettysburg

(Identify Department or Agency Represented and Political Subdivision)

PAPSP3100

(Police Agency ORI Number)

do hereby state: (check appropriate box)

- 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 is 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: 219 45 MAJOR BELL LN (ADAMS COUNTY PRISON),
(Subdivision Code) STRABAN TWP.,
(Place-Political Subdivision)

in ADAMS County

01
(County Code)

on or about 04/13/20, APPROXIMATELY 0833 HOURS
(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 307-20</i>	Date Filed: <i>6/10/20</i>	OTN/LiveScan Number <i>U894493-2</i>	Complaint/Incident Number PA2020-570496
Defendant Name	First: TERRENCE	Middle: R	Last: PEARSALL

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: 0
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<input type="checkbox"/> Lead?	1	780-113	(a)(30)	of the	Title 35, C.S.D.D.C.A.	1	F	18()/35A	
	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):

The Controlled Substance, Drug, Device and Cosmetic Act: Prohibited Acts; Penalties

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver suboxone, a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to a source of information, an inmate at Adams County Prison, in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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: 0
------------------	----------------------------------------------	---------------------------------------------------	-----------------------------------------------	--------------------------------------

<input type="checkbox"/> Lead?	4	7512	(a)	of the	Title 18, PA Crimes Code	1	F3	260/90Z	
	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):

CRIMINAL USE OF COMMUNICATION FACILITY

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted thereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every instance where the communication facility is utilized constitutes a separate offense under this section.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-30750</i>	Date Filed: <i>6/19/20</i>	OTN/LiveScan Number <i>U8844732</i>	Complaint/Incident Number PA2020-570496
Defendant Name	First: TERRENCE	Middle: R	Last: PEARSALL

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: 0

<input type="checkbox"/> Lead?	2	5123		of the	Title 18 , PA Crimes Code	1	F2		/
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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):

Contraband

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did sell, give, transmit or furnish to any convict in a prison, or inmate in a mental hospital, or give away in or bring into any prison, mental hospital, or any building appurtenant thereto, or on the land granted to or owned or leased by the Commonwealth or county for the use and benefit of the prisoners or inmates, or put in any place where it may be secured by a convict of a prison, inmate of a mental hospital, or employee thereof, any controlled substance included in The Controlled Substance, Drug, Device and Cosmetic Act w/o a written permit signed by the physician of such institution, specifying the quantity/quality of the substance which may be furnished to any convict, inmate, or employee in the prison or mental hospital, the name of the prisoner, inmate, or employee for whom, and the time when the same may be furnished, which permit shall be delivered to and kept by the warden or superintendent of the prison or mental hospital. TO WIT: The defendant did sell Suboxone, a Schedule III controlled substance, to a source of information, an inmate at the Adams County Prison.

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: 0

<input type="checkbox"/> Lead?	3	5123		of the	Title 18 , PA Crimes Code	1	F2		/
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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/Engage - Contraband

Acts of the accused associated with this Offense:

PA CRIMES CODE 903(a)(1)/5123(a) IN THAT, on or about said date, THE DEFENDANT, with the intent of promoting or facilitating the crime of Controlled Substance Contraband to Confined Persons Prohibited, did conspire and agree with Kody FULLER and Greta HASHANI that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof, did commit the act(s) of giving Suboxone, a Schedule III controlled substance, to the DEFENDANT, an inmate at the Adams County Prison



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-307-20</i>	Date Filed: <i>6/18/20</i>	OTN/LiveScan Number <i>U984473-2</i>	Complaint/Incident Number PA2020-570496
Defendant Name	First: TERRENCE	Middle:	Last: PEARSALL

- 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 4.
- 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.)

JUNE 18, 2020

(Date)

M. L. CA

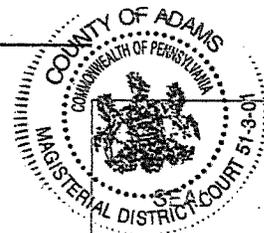
(Signature of Affiant)

AND NOW, on this date, June 18 2020 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.

21301

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 307520</i>	Date Filed: <i>6/10/20</i>	OTN/LiveScan Number: <i>U 2049732</i>	Complaint/Incident Number PA2020-570496
Defendant Name:	First: TERRENCE	Middle: R	Last: PEARSALL

AFFIDAVIT of PROBABLE CAUSE

Your affiant is a member of the Pennsylvania State Police and is assigned to the Criminal Investigations Unit at the Gettysburg Barracks. I have been employed by the Pennsylvania State Police since February 2013. My current assignment involves investigating misdemeanor/felony offenses which are alleged to have occurred in Adams County, PA.

On 04/24/20, approximately 1550 hours, PSP Gettysburg received a call from Warden Katy HILEMAN with the Adams County Prison (ACP). Warden HILEMAN reported an employee at ACP was bringing illegal contraband into the prison and was giving illegal contraband to an inmate. Warden HILEMAN identified the employee as Kody FULLER who was a drug treatment specialist at the prison. FULLER was responsible for counseling inmates with substance abuse problems. The ACP inmate was identified as Terrence PEARSALL.

On 04/24/20, approximately 1234 hours, Warden HILEMAN interviewed FULLER at ACP. During the interview, FULLER admitted to speaking with PEARSALL about bringing suboxone and marijuana into the prison. FULLER related that he met PEARSALL's girlfriend on 04/12/20 somewhere near route 30 in York, PA where she gave him a package containing the above items. PEARSALL's girlfriend was identified as Greta HASHANI. On 04/13/20, FULLER took the package containing illegal contraband and entered ACP where he gave the package to PEARSALL. FULLER claimed this was the only time he took illegal contraband into the prison.

CONTINUED:

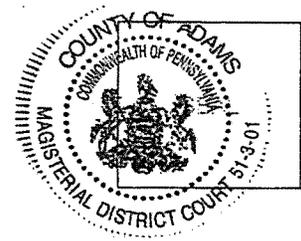
I, TPR. CAMERON BECK, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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.

TPR. Cameron Beck
(Signature of Affiant)

Sworn to me and subscribed before me this *10th* day of *June* *2020*
06/10/2020 Date _____, Magisterial District Judge

My commission expires first Monday of January *2020*





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CR-307-20</i>	Date Filed: <i>6/10/20</i>	OTN/LiveScan Number: <i>U884H7.3-2</i>	Complaint/Incident Number PA2020-570496
Defendant Name:	First: TERRENCE	Middle: R	Last: PEARSALL

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 04/24/20, approximately 1800 hours, I was informed by Warden HILEMAN that PEARSALL's cell was just searched and "13" suspected "suboxone strips" were located in the waistband of PEARSALL's sweatpants.

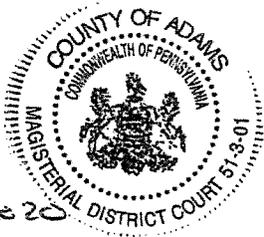
On 05/05/20, approximately 1621 hours, I interviewed FULLER at PSP Gettysburg. During the interview, FULLER was represented by his attorney and acknowledged the interview was going to be audible and visually recorded. During the interview, FULLER claimed that PEARSALL found out that he had a problem smoking weed and threatened to have him drug tested by ACP if he didn't bring him suboxone and marijuana. FULLER admitted to meeting PEARSALL's girlfriend, Greta HASHANI, in York, PA. FULLER admitted to receiving a package containing illegal contraband from HASHANI which he then took into ACP and gave to PEARSALL. FULLER admitted to receiving approximately \$200.00 for the transaction.

On 04/13/20, approximately 0833 hours, FULLER is observed on ACP video surveillance taking PEARSALL into the counseling room where FULLER admitted to giving PEARSALL a package containing illegal contraband.

During this investigation, numerous recorded ACP phone calls, letters, and ACP emails were reviewed between PEARSALL and his girlfriend, Greta HASHANI. The conversations contained several messages involving drug activity which including drug type, packaging, money, and plans for delivery.

CONTINUED:

06/18/20 20



(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CR-307-20</i>	Date Filed: <i>6/18/20</i>	OTN/LiveScan Number: <i>U994473-2</i>	Complaint/Incident Number PA2020-570496
Defendant Name:	First: TERRENCE	Middle: R	Last: PEARSALL

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 06/15/20, approximately 1305 hours, I interviewed Greta HASHANI at PSP Gettysburg. During the interview, HASHANI was represented by her attorney and acknowledged the interview was going to be audible and visually recorded. HASHANI admitted to meeting FULLER in York, PA. HASHANI admitted to packaging suboxone and marijuana which she gave to FULLER. However, HASHANI related that FULLER told her the he was going to repackage the items before he took them into the prison. HASHANI acknowledged all the recorded messages between her and PEARSALL. HASHANI also provided all the text messages between her and FULLER. The messages involved drug activity, showed FULLER being a willing participant, and provided instructions to HASHANI about where to meet FULLER in York, PA.

On 06/16/20, approximately 0945 hours, I interviewed an inmate (source of information) at ACP. The inmate admitted to purchasing suboxone from PEARSALL. According to the inmate, each strip of suboxone was sold for \$100-120 using a cash app.

Based on the aforementioned, I respectfully request that the Defendant, Terrence PEARSALL, be brought to this court to answer to these charges.



(Signature of Affiant)



Preliminary Hearing Notice

Mag. Dist. No: MDJ-51-3-01
MDJ Name: Honorable Matthew Robert Harvey
Address: 525 Boyds School Road
Suite 900
Gettysburg, PA 17325
Telephone: 717-334-7913

Commonwealth of Pennsylvania
v.
Greta Hashani

Adams County District Attorney's Office
Adams County Courthouse
111-117 Baltimore Street
Gettysburg, PA 17325

Docket No: MJ-51301-CR-0000308-2020
Case Filed: 6/18/2020
Comp/Cit #: PA2020570694
OTN: U 884487-2

Your Role: District Attorney

Charge(s)	
35 § 780-113 §§ A30 (Lead)	Manufacture, Delivery, or Possession With Intent to Manufacture or Deliver
18 § 5123 §§ A	Contraband/Controlled Substance
18 § 903 §§ A1	Criminal Conspiracy Engaging - Contraband/Controlled Substance

A Preliminary Hearing has been scheduled for the above captioned case to be held on/at:

Date: Wednesday, June 24, 2020	Place: Magisterial District Court 51-0-01, Gettysburg Adams County Human Services Buidling Courtroom, Suite 700 525 Boyds School Road Gettysburg, PA 17325 717-337-9846
Time: 3:00 PM	

Comments: Suite 900

Notice To Defendant

A complaint has been filed charging you with the offense(s) set forth above and on the attached copy of the complaint. If you fail to appear at the time and place above without cause, you will be deemed to have waived your right to be present at any further proceedings before the Magisterial District Judge and the case will proceed in your absence. If any of the charges against you are held for court, a request for a bench warrant against you will be transmitted to the Court of Common Pleas.

At the preliminary hearing you may:

1. Be represented by counsel;
 2. Cross-examine witnesses and inspect physical evidence offered against you;
 3. Call witnesses on your behalf other than witnesses to testify to your good reputation only, offer evidence on your behalf and testify;
 4. Make written notes of the proceeding, or have your counsel do so, or make a stenographic, mechanical, or electronic record of the proceedings.
- if the case is held for court and if you fail to appear without cause at any proceeding for which your presence is required, including trial, your absence may be deemed a waiver of your right to be present, and the proceeding, including the trial, may be conducted in your absence.

If you cannot afford to hire an attorney, one may be appointed to represent you. Please contact the office of the Magisterial District Judge for additional information regarding the appointment of an attorney. If you have any questions, please call the above office immediately. Should you fail to appear for your preliminary hearing, a warrant will be issued for your arrest.

June 18, 2020

Date

The Honorable Matthew Harvey



If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation. You can make case payments online through Pennsylvania's Unified Judicial System web portal. Visit the portal at <https://ujportal.pacourts.us/epay> to make a payment.



All Charge(s)

35 § 780-113 §§ A30 (Lead)

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

18 § 5123 §§ A

Contraband/Controlled Substance

18 § 903 §§ A1

Criminal Conspiracy Engaging - Contraband/Controlled Substance

18 § 7512 §§ A

Criminal Use Of Communication Facility



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ADAMS



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 51-3-01
MDJ Name: Hon. MATTHEW R. HARVEY
Address: 525 BOYDS SCHOOL RD
SUITE 900,
GETTYSBURG, PA 17325
Telephone: 717-334-7913

DEFENDANT: (NAME and ADDRESS):
GRETA HASHANI
First Name Middle Name Last Name Gen.
5910 HUNTINGDON CIRCLE
HARRISBURG, PA 17111
717-736-2803

NCIC EXTRADITION CODE TYPE

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CR 308-20 Date Filed: 6/18/20 OTN/LiveScan Number: U884487-2 Complaint/Incident Number: PA2020-570496 Request Lab Services? YES NO

GENDER: Male Female DOB: 02/07/96 POB: PA 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 / Auburn) 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.): 130

FBI Number: 9471CE0 MNU Number: Ft. HEIGHT In.: 5 2

Defendant Fingerprinted: YES 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, Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. CAMERON BECK

(Name of Affiant - Please Print or Type)

00700187/12249

(PSP/MP/POETC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania State Police, Troop H, Gettysburg

(Identify Department or Agency Represented and Political Subdivision)

PAPSP3100

(Police Agency ORI Number)

do hereby state: (check appropriate box)

- 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 is 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: 219 45 MAJOR BELL LN (ADAMS COUNTY PRISON),
(Subdivision Code) STRABAN TWP.,
(Place-Political Subdivision)

in ADAMS County

01
(County Code)

on or about 04/13/20, APPROXIMATELY 0833 HOURS
(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CL 308-20</i>	Date Filed: <i>6-18-20</i>	OTN/LiveScan Number <i>0684487-2</i>	Complaint/Incident Number PA2020-570496
Defendant Name	First: GRETA	Middle:	Last: HASHANI

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: 0
------------------	----------------------------------------------	---------------------------------------------------	-----------------------------------------------	--------------------------------------

<input type="checkbox"/> Lead?	1	780-113	(a)(30)	of the	Title 35 , C.S.D.D.C.A.	1	F	18()/35A
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):
The Controlled Substance, Drug, Device and Cosmetic Act; Prohibited Acts; Penalties

Acts of the accused associated with this Offense:
 IN THAT, on or about said date, THE DEFENDANT, not being registered under the Controlled Substance, Drug, Device and Cosmetic Act, nor a practitioner registered or licensed by the appropriate State board, did knowingly manufacture, deliver, or possess with intent to manufacture or deliver suboxone, a controlled substance, or knowingly create, deliver or possess with intent to deliver, a counterfeit controlled substance to Kody FULLER, in violation of Section 780-113(a)(30) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

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: 0
------------------	----------------------------------------------	---------------------------------------------------	-----------------------------------------------	--------------------------------------

<input type="checkbox"/> Lead?	4	7512	(a)	of the	Title 18 , PA Crimes Code	1	F3	260/90Z
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):
CRIMINAL USE OF COMMUNICATION FACILITY

Acts of the accused associated with this Offense:
 IN THAT, on or about said date, THE DEFENDANT did use a communication facility to commit, cause or facilitate the commission or attempted thereof any crime which constitutes a felony under this title or under the act of April 14, 1972, known as The Controlled Substance, Drug, Device and Cosmetic Act. Every instance where the communication facility is utilized constitutes a separate offense under this section.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CL 308-20</i>	Date Filed: <i>6-18-20</i>	OTN/LiveScan Number <i>0884487.2</i>	Complaint/Incident Number PA2020-570496
Defendant Name	First: GRETA	Middle:	Last: HASHANI

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: 0

<input type="checkbox"/> Lead?	2	5123		of the	Title 18 , PA Crimes Code	1	F2		/
	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):
Contraband

Acts of the accused associated with this Offense:
IN THAT, on or about said date, THE DEFENDANT did sell, give, transmit or furnish to any convict in a prison, or inmate in a mental hospital, or give away in or bring into any prison, mental hospital, or any building appurtenant thereto, or on the land granted to or owned or leased by the Commonwealth or county for the use and benefit of the prisoners or inmates, or put in any place where it may be secured by a convict of a prison, inmate of a mental hospital, or employee thereof, any controlled substance included in The Controlled Substance, Drug, Device and Cosmetic Act w/o a written permit signed by the physician of such institution, specifying the quantity/quality of the substance which may be furnished to any convict, inmate, or employee in the prison or mental hospital, the name of the prisoner, inmate, or employee for whom, and the time when the same may be furnished, which permit shall be delivered to and kept by the warden or superintendent of the prison or mental hospital. TO WIT: The defendant did give Suboxone, a Schedule III controlled substance, to Terrence PEARSALL, an inmate at the Adams County Prison.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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Number of Victims Age 60 or Older: 0

<input type="checkbox"/> Lead?	3	5123		of the	Title 18 , PA Crimes Code	1	F2		/
	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/Engage - Contraband

Acts of the accused associated with this Offense:
PA CRIMES CODE 903(a)(1)/5123(a) IN THAT, on or about said date, THE DEFENDANT, with the intent of promoting or facilitating the crime of Controlled Substance Contraband to Confined Persons Prohibited, did conspire and agree with Kody FULLER and Greta HASHANI that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof, did commit the act(s) of giving Suboxone, a Schedule III controlled substance, to Terrence PEARSALL, an inmate at the Adams County Prison



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number PA2020-570496
Defendant Name	First: GRETA	Middle:	Last: HASHANI

- 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 4
- 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.)

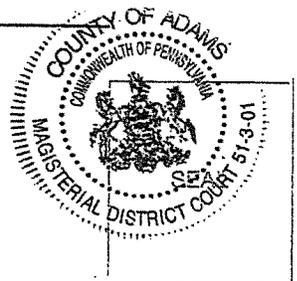
JUNE 18, 2020
(Date)

M. G. ...
(Signature of Affiant)

AND NOW, on this date, June 18 2020 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.

51-3-01
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 308 20</i>	Date Filed: <i>16.18.20</i>	OTN/LiveScan Number: <i>U884487.2</i>	Complaint/Incident Number PA2020-570496
Defendant Name:	First: GRETA	Middle:	Last: HASHANI

AFFIDAVIT of PROBABLE CAUSE

Your affiant is a member of the Pennsylvania State Police and is assigned to the Criminal Investigations Unit at the Gettysburg Barracks. I have been employed by the Pennsylvania State Police since February 2013. My current assignment involves investigating misdemeanor/felony offenses which are alleged to have occurred in Adams County, PA.

On 04/24/20, approximately 1550 hours, PSP Gettysburg received a call from Warden Katy HILEMAN with the Adams County Prison (ACP). Warden HILEMAN reported an employee at ACP was bringing illegal contraband into the prison and was giving illegal contraband to an inmate. Warden HILEMAN identified the employee as Kody FULLER who was a drug treatment specialist at the prison. FULLER was responsible for counseling inmates with substance abuse problems. The ACP inmate was identified as Terrence PEARSALL.

On 04/24/20, approximately 1234 hours, Warden HILEMAN interviewed FULLER at ACP. During the interview, FULLER admitted to speaking with PEARSALL about bringing suboxone and marijuana into the prison. FULLER related that he met PEARSALL's girlfriend on 04/12/20 somewhere near route 30 in York, PA where she gave him a package containing the above items. PEARSALL's girlfriend was identified as Greta HASHANI. On 04/13/20, FULLER took the package containing illegal contraband and entered ACP where he gave the package to PEARSALL. FULLER claimed this was the only time he took illegal contraband into the prison.

CONTINUED:

I, TPR. CAMERON BECK, 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.

TPR. C. Beck

(Signature of Affiant)

Sworn to me and subscribed before me this 19th day of

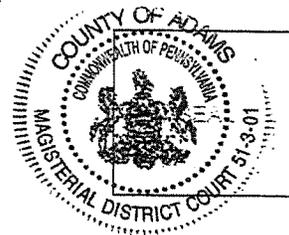
June

2020

06/18/2020 Date

_____, Magisterial District Judge

My commission expires first Monday of January, 2020





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CR 308 20</i>	Date Filed: <i>6.18.20</i>	OTN/LiveScan Number: <i>U884487-2</i>	Complaint/Incident Number PA2020-570496
Defendant Name:	First: GRETA	Middle:	Last: HASHANI

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

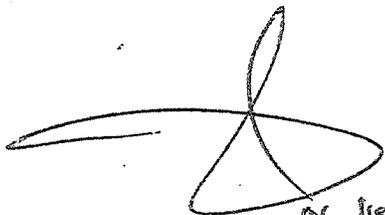
On 04/24/20, approximately 1800 hours, I was informed by Warden HILEMAN that PEARSALL's cell was just searched and "13" suspected "suboxone strips" were located in the waistband of PEARSALL's sweatpants.

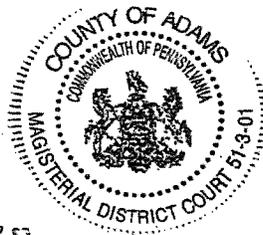
On 05/05/20, approximately 1621 hours, I interviewed FULLER at PSP Gettysburg. During the interview, FULLER was represented by his attorney and acknowledged the interview was going to be audible and visually recorded. During the interview, FULLER claimed that PEARSALL found out that he had a problem smoking weed and threatened to have him drug tested by ACP if he didn't bring him suboxone and marijuana. FULLER admitted to meeting PEARSALL's girlfriend, Greta HASHANI, in York, PA. FULLER admitted to receiving a package containing illegal contraband from HASHANI which he then took into ACP and gave to PEARSALL. FULLER admitted to receiving approximately \$200.00 for the transaction.

On 04/13/20, approximately 0833 hours, FULLER is observed on ACP video surveillance taking PEARSALL into the counseling room where FULLER admitted to giving PEARSALL a package containing illegal contraband.

During this investigation, numerous recorded ACP phone calls, letters, and ACP emails were reviewed between PEARSALL and his girlfriend, Greta HASHANI. The conversations contained several messages involving drug activity which including drug type, packaging, money, and plans for delivery.

CONTINUED:


06/18/2020





(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

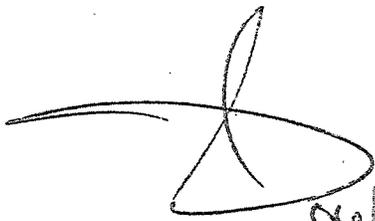
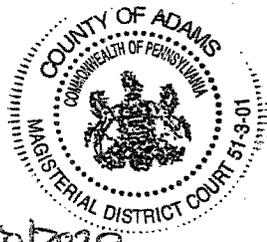
Docket Number: <i>CL 305 20</i>	Date Filed: <i>06/18/20</i>	OTN/LiveScan Number: <i>UE84487.2</i>	Complaint/Incident Number PA2020-570496
Defendant Name:	First: GRETA	Middle:	Last: HASHANI

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 06/15/20, approximately 1305 hours, I interviewed Greta HASHANI at PSP Gettysburg. During the interview, HASHANI was represented by her attorney and acknowledged the interview was going to be audible and visually recorded. HASHANI admitted to meeting FULLER in York, PA. HASHANI admitted to packaging suboxone and marijuana which she gave to FULLER. However, HASHANI related that FULLER told her the he was going to repackage the items before he took them into the prison. HASHANI acknowledged all the recorded messages between her and PEARSALL. HASHANI also provided all the text messages between her and FULLER. The messages involved drug activity, showed FULLER being a willing participant, and provided instructions to HASHANI about where to meet FULLER in York, PA.

On 06/16/20, approximately 0945 hours, I interviewed an inmate (source of information) at ACP. The inmate admitted to purchasing suboxone from PEARSALL. According to the inmate, each strip of suboxone was sold for \$100-120 using a cash app.

Based on the aforementioned, I respectfully request that the Defendant, Greta HASHANI, be brought to this court to answer to these charges.

T.M. ...

(Signature of Affiant)