

COMMONWEALTH OF PENNSYLVANIA

: IN THE COURT OF COMMON PLEAS

V.

: CHESTER COUNTY, PENNSYLVANIA

Laquanta Chapman

: CRIMINAL ACTION

: NO. MD-1872-2008

COMMONWEALTH'S MOTION TO INCREASE BAIL

AND NOW, this 3rd day of December, 2008, comes the Commonwealth, through its attorney, Lauren Kristen Dentone, Assistant District Attorney, who represents the following:

1. On November 15, 2008 the defendant was charged with possession of controlled substance, firearms not to be carried without a license, possession or distribution of a small amount of marijuana, manufacture of a controlled substance, possession of firearm prohibited, killing/maiming a domestic animal, recklessly endangering another person, and abuse of a corpse. District Justice Blackburn set the defendant's bail at \$5000 cash.¹
2. On that same date, a search warrant was executed on the defendant's residence located at 35 Chester Avenue, Coatesville, Chester County PA. When police arrived the defendant was uniformed in a bulletproof vest and armed with a shoulder holster containing two fully loaded handguns.² Incident to the executed search warrant seven (7) firearms were recovered; two (2) of which were reported stolen. Also recovered was 2 bags of marijuana, a scale, and numerous pieces of paraphernalia indicative of drug distribution.
3. On November 19, 2008 the defendant's bail was re-set in the amount of \$100,000 cash by District Justice Davis.
4. Pa.R.Crim.P. 523(A) requires a Court, in setting bail, to consider:
 - a. the nature of the offense charged and any mitigating or aggravating factors that may bear upon the likelihood of conviction and possible penalty;
 - b. the defendant's employment history and financial condition;
 - c. the nature of the defendant's family relationships;
 - d. the length and nature of the defendant's residence in the community and any past residences;
 - e. the defendant's age, character, reputation, mental condition, and whether addicted to alcohol or drugs;

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¹ ABC Bail Bond posted that amount

² One .357 magnum Ruger & a Ruger "Old Army" black powder

- f. if the defendant was previously released on bail, whether he/she appeared as required and complied with the conditions of bail;
 - g. any record of flight or escape;
 - h. any prior criminal record;
 - i. any use of false identification;
 - j. any other factors relevant to whether the defendant will appear as required and comply with the conditions of bail.
5. The current bail is inadequate to ensure both the safety of the public, and that the defendant will appear as required.
 6. Defendant admits to being a convicted felon and understands that he is not legally permitted to possess a firearm.
 7. Defendant further admits to being in possession of multiple ounces of marijuana which he would sell from his residence for profit.
 8. Defendant finally admits to killing two (2) dogs in his residence and ultimately dismembering the dogs with a chain saw in order to dispose of them.
 9. The defendant has an extensive prior criminal history in both New Jersey as well as in Pennsylvania; with numerous convictions for violent crimes and drug related offenses under both the name Laquanta Chapman as well as an alias Lamar Bookman.
 - a. On December 24, 1996 the defendant was charged in Chester County Pennsylvania with 2 counts of aggravated assault, 3 counts of simple assault, recklessly endangering another person, terroristic threats, possession of an instrument of a crime, possession of a weapon and criminal conspiracy. SEE EXHIBIT A
 2. On March 3, 1997 the defendant was declared a fugitive in this case.
 3. On August 11, 1998 the defendant pled guilty to Carrying a firearm without a license and received a sentence of 6 – 23 months.
 4. On January 19, 1999 a bench warrant was issued for a violation of parole and was not until September 15, 2003 that the bench warrant was quashed.³
 - b. On March 20, 1998 the defendant was charged in Chester County Pennsylvania with possession of a controlled substance. SEE EXHIBIT B
 - i. On August 11, 1998 the defendant pled guilty to the above charge and was given 1 year of probation.
 - c. On December 20, 1998 the defendant was charged in Chester County Pennsylvania with possession of a controlled substance, recklessly endangering another person, possession of an instrument of a crime, and make/sells/repairs etc and offensive weapon. SEE EXHIBIT C

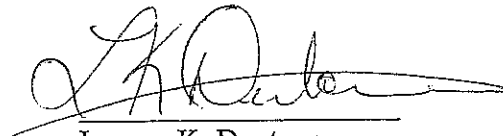
³ Bench Warrant was lodged as a detainer for charges that the defendant was facing in New Jersey

- i. On January 18, 2000 the defendant was declared a fugitive.
 - ii. The defendant was picked up as a fugitive and arraigned on November 14, 2001.
 - iii. On December 4, 2001 the defendant pled guilty to the crime of possession of a controlled substance and was given probation.
 - d. On February 26, 1999 in Chester County Pennsylvania the defendant was charged with Possession with Intent to Deliver and possession of a controlled substance. SEE EXHIBIT D
 - i. On January 18, 2000 the defendant was declared a fugitive.
 - ii. On January 3, 2001 both charges were nolle processed.
 - e. On September 14, 1999 in Essex County New Jersey under the alias of Lamar Bookman, the defendant was charged with possession of a controlled substance within 1000 feet of a school zone, the unlawful possession of a weapon and three (3) counts of jumping bail. SEE EXHIBIT E
 - i. On July 21, 2000 the defendant pled guilty to possession of a controlled substance in a school zone as well as the unlawful possession of a weapon and was given a sentence of 3 years of incarceration on each charge to be served concurrent to one another.
 - f. Also on September 14, 1999 in Essex County New Jersey under the alias of Lamar Bookman, the defendant was charged with 2 counts of aggravated assault, unlawful possession of a weapon, and possession of a weapon for an unlawful purpose. SEE EXHIBIT F
 - i. On September 1, 2000 the defendant pled guilty to aggravated assault and the unlawful possession of a firearm. The defendant was sentenced to 18 months on the aggravated assault and 4 years of incarceration concurrent to the aggravated assault on the unlawful possession charge.
 - g. On July 14, 2000 the defendant was arrested in Essex County New Jersey and charged with aggravated assault, the unlawful possession of a weapon, possession of a weapon for an unlawful purpose, and receiving stolen property. SEE EXHIBIT G
 - i. On June 9, 2003 the defendant pled guilty to aggravated assault to which he was sentenced to a period of incarceration of 18 months as well as pleading guilty to unlawful possession of a weapon to which the defendant was sentenced to 3 years of incarceration to be served concurrent to the aggravated assault charge.
- 10. The defendant is a flight risk and a danger to this Commonwealth. Laquanta Chapman has absconded and been a fugitive on nearly ever case with which he has been charged and supervised. The defendant is an admitted drug dealer and has numerous convictions for drug related offenses. Further the defendant has numerous convictions for violent crimes, most all of them involving the possession of a firearm

when the defendant not only is prohibited by law from carrying a firearm, but admits to and acknowledges his status as a felon not to possess a firearm. Given the serious nature of the present case in conjunction with the strength of the Commonwealth's case and defendant's prior criminal history; the defendant poses as a serious flight risk.

Based on the foregoing, the Commonwealth respectfully requests that bail be increased to \$750,000 cash. If the defendant is capable of posting the requested bail, we ask that the defendant be placed on Electronic Home Confinement to be served at a residence within Chester County, Pennsylvania.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "L. K. Dentone", written over a horizontal line.

Lauren K. Dentone
Assistant District Attorney