

THE STATE OF NEW HAMPSHIRE

Hillsborough, SS

NH Circuit Court  
9<sup>th</sup> Circuit-District Division - Manchester

v.

**John Gebo (03-15-86)**

Docket # 456-2016-CR-2258

Docket # 456-2016-CR-2420

Docket # 456-2016-CR-2261

**ADDENDUM TO STATE'S MOTION TO REVOKE BAIL**

**NOW COMES** The State of New Hampshire by and through its prosecutor, Manchester Police Capt. Maureen Tessier, with its Motion to Revoke the Defendant's Bail pursuant to RSA 597:7-a and in support thereof states as follows:

1. That on May 02, 2016, the defendant John Gebo was arrested on warrants stemming from an investigation charging him with two counts of Receiving Stolen Property, RSA 637:7, one count of Theft by Deception, RSA 637:4; and one count of Forgery, RSA 638:1, III. Additional warrants stemming from a second investigation charged him with one count of Theft by Deception, RSA 637:4 and Receiving Stolen Property, RSA 637:7.

2. That on May 03, 2016, the defendant was arraigned in the 9<sup>th</sup> Circuit Court-District Division – Manchester, where a \$2500 cash/surety bail was ordered along with conditions of release. The conditions of release included an order that the Defendant:

- ***not commit a federal, state or local crime while on release not commit a federal, state or local crime while on release***
- ***Refrain from any use of alcohol, and the use of narcotic or controlled substance as defined in RSA 318-B***

3. That on May 09, 2016, Gebo was arrested and charged with two counts of Fraudulent Use of a Credit Card, RSA 638:5, which occurred on 04-18-16.

4. That on May 10, 2016, the defendant was arraigned in the 9<sup>th</sup> Circuit Court-District Division – Manchester, where a \$1000 PR bail was ordered along with conditions of release. The conditions of release included an order that the Defendant:

- ***not commit a federal, state or local crime while on release not commit a federal, state or local crime while on release***
- ***Refrain from any use of alcohol, and the use of narcotic or controlled substance as defined in RSA 318-B***

3. That on June 09, 2016 Gebo was arrested on warrants charging him with 4 counts of Reckless Conduct where he allegedly discharged a firearm four times at an occupied building on June 08, 2016 at 4:00 AM. He was additionally charged with being a convicted felon in Possession of a Dangerous Weapon (firearm) on that same date and time, as well as Sale of a Narcotic Drug (crack cocaine) on June 08, 2016 at 11:00 PM at 712 Valley Street.

4. That on June 10, 2016, a search warrant was executed at the defendant's residence at 273 Belmont Street, second floor, and a quantity of cocaine and crack cocaine was located. Gebo was additionally charged with one count of Possession of a Controlled Drug with Intent to Distribute (cocaine), RSA 318-B:2 and one count of Possession of a Controlled Drug with Intent to Distribute, RSA 318-B:2.

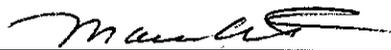
5. That the defendant has blatantly disregarded the orders and conditions of bail established by the court and the original bail is no longer sufficient to assure that the Defendant will comply with any set of conditions imposed by the court. There are no conditions, which the court could impose at this point that would assure the safety of the community.

THEREFORE, the State respectfully requests that this Honorable Court grant the following relief:

- A) Revoke the Defendant's bail immediately pursuant to RSA 597:7-a and order the Defendant held without bail pending trial;
- B) For such other relief as this Honorable Court finds just.

Respectfully Submitted:

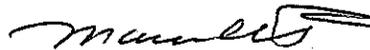
June 13, 2016



Capt. Maureen Tessier  
Manchester Police Department  
405 Valley Street  
Manchester, NH 03103

**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing motion has been forwarded to the Defendant, John Gebo, 03-15-86 on this 13th day of June, 2016.



Capt. Maureen Tessier