

SUPERIOR COURT OF N.J.
FILED

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Andrew J. Kelly
Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ539-07-5

Superior Court
Docket Number 07-06-00061-S

STATE OF NEW JERSEY

v.

DAVID ALLEN
also known as
"DUKE"

TAHAIJ WELLS
also known as
"NORY"

EBONY MYERS
also known as
"EB"

JERMAINE LITTLE
also known as
"THE DON"
also known as
"MACK"

JAMES PRINGLE
also known as
"RELL"
also known as
"HELL RELL"
also known as
"ONE LEGGED RELL"

EMELIO CRESPO
also known as
"ROGER RABBIT"

BISHOP BENNETT
also known as
"NOON"

JOHN ABBEY
also known as
"JOHNNY HOOKS"

INDICTMENT

MONAUD TOUSSAINT)
 also known as)
 "LITTLE DAMU")
 also known as)
 "DAMU")

 MICHAEL SMART)
 also known as)
 "TORCH")

 STANLEY FOOTE)
 also known as)
 "MURDER")

 TERRELL WILLIAMS)
 also known as)
 "LITTLE REL")

 ANDRE ARMAND)
 also known as)
 "DRE")

 JEAN LENEUS)
 also known as)
 "JUNE")
 also known as)
 "QUIET")

 DARIUS HUDGINS)
 also known as)
 "D-MAN")

 ALMEEN PALMER)
 also known as)
 "AB LOUCH")
 also known as)
 "LT. LOUCH")

 OSCAR RANDALL)
 also known as)
 "DIABLO")

 EDWARD WATKINS)
 also known as)
 "KAOS")

WILLIAM ROBINSON)
also known as)
"ILL WILL")

RANDOLPH BOYD)
also known as)
"BOY WONDER")

JOSHUA HOPEWELL)
also known as)
"RED RUM")

KELSEY SMITH)
also known as)
"GAUGE")

QUASON BLAKE)
also known as)
".50 CAL.")

MARVIN BUSBY)
also known as)
"PIT BULL")

KAHLI THOMPSON)
also known as)
"SOLO")

GERALD BUSBY)
also known as)
"BABY G")

STEVEN ARMSTEAD)
also known as)
"TRIPP")

WILLIAM DAVIS)
also known as)
"GOOSE")

OCTAVIA HALL)
also known as)
"SHAKELY SIMMONS")
also known as)
"BASH")

ABDUL WILLIAMS)
also known as)
"AB")
EVELYN PARKER CAMPOS)
MICHAEL EVERETT)
ANTWINE HOPEWELL)
also known as)
"BLOOD MONEY")
DANUWELLI KELLER)
also known as)
"PELE")
KEITH BASS)
also known as)
"STREETS")
DAVID CRAIG)
also known as)
"LITTLE DAVID")
DAKKIMAH BARNETT)
also known as)
"KEEMA")
MERVIN GRANT)
also known as)
"LION")
OOHMANO PRINGLE)
also known as)
"PETE")
EDDIE GILBERT)
also known as)
"DOONEY")
NASHAUN ROBERTS)
also known as)
"BUMP")
also known as)
"LITTLE DUKE")

TYRONE BRIGGS)
 also known as)
 "STINK")
 also known as)
 "AL MALEEK")

 WESLEY HOWARD)
 also known as)
 "DEEZ")
 also known as)
 "LEE")

 JACQUELINE BARNETT)
 also known as)
 "JACK BONE")
 also known as)
 "JACKIE")

 DESHAWN WINSTON)
 also known as)
 "S")

 HENRY ROSS)
 also known as)
 "HANK")
 also known as)
 "HIGH TECH")

 HASSAN MOSELY)
 also known as)
 "BUBBA HASS")
 also known as)
 "DICE")

 and)

 KAZIAYAH NICOLE JONES)

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Racketeering - First Degree)

DAVID ALLEN

TAHAIJ WELLS

EBONY MYERS

JERMAINE LITTLE

JAMES PRINGLE

EMELIO CRESPO

BISHOP BENNETT

JOHN ABBEY

MONAUD TOUSSAINT

MICHAEL SMART

STANLEY FOOTE

TERRELL WILLIAMS

ANDRE ARMAND

JEAN LENEUS

DARIUS HUDGINS

ALMEEN PALMER

OSCAR RANDALL

EDWARD WATKINS

WILLIAM ROBINSON

RANDOLPH BOYD

JOSHUA HOPEWELL

KELSEY SMITH

QUASON BLAKE
MARVIN BUSBY
KAHLI THOMPSON
GERALD BUSBY
STEVEN ARMSTEAD
WILLIAM DAVIS
OCTAVIA HALL
ABDUL WILLIAMS
EVELYN PARKER CAMPOS
ANTWINE HOPEWELL
DANUWELLI KELLER
KEITH BASS
DAVID CRAIG
DAKKIMAH BARNETT
MERVIN GRANT
OOHMANO PRINGLE
EDDIE GILBERT
NASHAUN ROBERTS
TYRONE BRIGGS
WESLEY HOWARD
JACQUELINE BARNETT
DESHAWN WINSTON

HENRY ROSS

and

HASAN MOSELY

who are named as the defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, at the times and places herein specified, did commit the crime of racketeering, that is, the defendants and other persons employed by and associated with the enterprise engaged in activities which affected trade or commerce in the State of New Jersey:

1. Purposely or knowingly did conduct or participate directly or indirectly in the conduct of the enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt, including the commission of crimes of violence, crimes of the first degree, or crimes involving the use of firearms, contrary to the provisions of N.J.S.A. 2C:41-2c; or

2. With the purpose of promoting or facilitating the commission of the crime of racketeering, did conspire and agree together and with persons whose identities are known to the Grand Jurors, who at times relevant to this indictment were acting at the direction of various law enforcement agencies that:

A. One or more of them would engage in conduct which would constitute the crime of racketeering; or

B. One or more of them would aid in the planning, solicitation or commission of the crime of racketeering, that is, to conduct or participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity or collection of an unlawful debt, including the commission of crimes of violence, crimes of the first degree, or crimes involving the use of firearms, in violation of N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES AND PLACES

The predicate criminal activity and conspiracy occurred between on or about February 1, 2005, and on or about November 17, 2006, at the City of Trenton, in the County of Mercer, at the Cities of Newark, Irvington, and East Orange, all in the County of Essex, at the Cities of Bridgeton, Millville and Vineland, all in the County of Cumberland, at the Cities of Atlantic City and Pleasantville, and at the Townships of Hamilton and Galloway, all in the County of Atlantic, at the Township of Dover, in the County of Morris, at the City of Paterson, in the County of Passaic, at the Township of Lower, in the County of Cape May, at the City of New York City, in the State of New York, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

DAVID ALLEN, TAHAIJ WELLS, EBONY MYERS, JERMAINE LITTLE, JAMES PRINGLE, EMELIO CRESPO, BISHOP BENNETT, JOHN ABBEY, MONAUD

TOUSSAINT, MICHAEL SMART, STANLEY FOOTE, TERRELL WILLIAMS, ANDRE ARMAND, JEAN LENEUS, DARIUS HUDGINS, ALMEEN PALMER, OSCAR RANDALL, EDWARD WATKINS, WILLIAM ROBINSON, RANDOLPH BOYD, JOSHUA HOPEWELL, KELSEY SMITH, QUASON BLAKE, MARVIN BUSBY, KAHLI THOMPSON, GERALD BUSBY, STEVEN ARMSTEAD, WILLIAM DAVIS, OCTAVIA HALL, ABDUL WILLIAMS, EVELYN PARKER CAMPOS, ANTWINE HOPEWELL, DANUWELLI KELLER, KEITH BASS, DAVID CRAIG, DAKKIMAH BARNETT, MERVIN GRANT, OOHMANO PRINGLE, EDDIE GILBERT, NASHAUN ROBERTS, TYRONE BRIGGS, WESLEY HOWARD, JACQUELINE BARNETT, DESHAWN WINSTON, HENRY ROSS, HASSAN MOSELY, and other persons whose identities are known and unknown to the Grand Jurors, did constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, namely the Nine Trey Gangsters set of the Bloods street gang, also known as "Nine Three," and "Nine Tech."

THE PURPOSES OF THE ENTERPRISE

It was a part of the conspiracy that the purposes of the enterprise would include the following:

A. Obtaining money and property for members and associates of the enterprise through violations of the laws of the State of New Jersey, including the commission of the crimes of leader of a narcotics trafficking network, distribution of controlled dangerous substances, utilizing a juvenile in a drug

distribution scheme, extortion, robbery, theft, promoting prostitution, and money laundering.

B. The protection of members and associates of the enterprise, the protection of the reputation of members and associates and of the reputation of the Nine Trey Gangsters set as a whole, and the protection of territory controlled by the Nine Trey Gangsters set through violent acts and the threat of violence and retaliation against members of rival gangs and others, and other violations of the laws of the State of New Jersey, including the commission of the crimes of murder, extortion, robbery, kidnapping, burglary, terroristic threats, hindering prosecution, tampering with witnesses, possession of weapons during the commission of certain crimes, unlawful manufacture, purchase, use or transfer of firearms, kidnapping, aggravated assaults and assault.

C. Perpetuating the enterprise through an organized and structured chain of command and rank structure, rules and regulations, and a process for disciplining members who violate the chain of command or rules, which include the commission of violations of the laws of the State of New Jersey, including the commission of the crimes of murder, extortion, robbery, kidnapping, burglary, and the unlawful manufacture, purchase, use or transfer of firearms, aggravated assault, and assault.

D. Accomplishing the goals of the enterprise through the collection of dues generated through the commission of various crimes from members of the enterprise, said dues to be utilized for the advancement and benefit of the enterprise or its leader's, including the purchase of real property, the purchase of weapons, the hiring of attorneys for members charged with crimes, or the posting of bail for incarcerated members.

E. To conceal from law enforcement authorities the existence of the enterprise, the means and locations from which it conducts its affairs, including but not limited to using wireless telephones, a variety of locations, residences or motor vehicles for storage or delivery of controlled dangerous substances which members and associates of the enterprise bought and sold, and through acts or threats of violence or retaliation against rival gang members and the others who cooperate or testify against members of the enterprise.

F. The solicitation, recruitment and initiation of others to join or actively participate in the Nine Trey Gangsters set with knowledge that the person solicited or recruited would promote, further, assist, plan, aid, agree, or attempt to aid in the commission of criminal conduct by a member of the Nine Trey Gangsters set, in violation of N.J.S.A. 2C:33-28.

G. Claiming territory to create safe havens for drug sales and other illegal activities of the Nine Trey Gangsters set

and maintaining control over these areas through acts of violence or retaliation or through the threat of violence or retaliation, thereby allowing members of the Nine Trey Gangsters set to have unfettered access to lucrative drug locations in which to sell controlled dangerous substances.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, consisted of at least two incidents of racketeering activity, including Leader of Narcotics Trafficking Network (N.J.S.A. 2C:35-3), Murder (N.J.S.A. 2C:11-3), Kidnapping (N.J.S.A. 2C:13-1), Promoting Prostitution (N.J.S.A. 2C:34-1), Theft (N.J.S.A. 2C:20-1 et seq.), Burglary (N.J.S.A. 2C:18-2), Money Laundering (N.J.S.A. 2C:21-25), Unlawful Manufacture, Purchase, Use or Transfer of Firearms (N.J.S.A. 2C:39-1 et seq.), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Employing a Juvenile in a Drug Distribution Scheme (N.J.S.A. 2C:35-6), Controlled Dangerous Substances Near or On School Property (N.J.S.A. 2C:35-7), Distributing, Dispensing or Possessing Controlled Dangerous Substances Within 500 Feet of Certain Public Property (N.J.S.A. 2C:35-7.1), or conspiracies to commit these crimes, as described herein and in Counts Two through Seventy-Four of this Indictment.

DAVID ALLEN

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Leader of Narcotics Trafficking Network, and Theft by Extortion, as detailed in Counts Six, Eight, and Nine of this Indictment.

TAHAIJ WELLS

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

EBONY MYERS

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

JERMAINE LITTLE

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Leader of Narcotics Trafficking Network, as detailed in Counts Six and Eight of this Indictment.

JAMES PRINGLE

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Leader of Narcotics Trafficking Network, Attempted Murder, and Possession with Intent to Distribute a Controlled Dangerous Substance, as detailed in Counts Three, Six, Eight, Thirteen, Fifty-Three, Fifty-Four, Sixty-One, and Sixty-Three of this Indictment.

EMELIO CRESPO

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Distribution of a Controlled Dangerous Substance, as detailed in Counts Six and Forty-Nine of this Indictment.

BISHOP BENNETT

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Theft by Extortion, as detailed in Counts Six and Nine of this Indictment.

JOHN ABBEY

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to

Distribute, and Possess a Controlled Dangerous Substance, Unlawful Disposition of a Weapon, Money Laundering, and Theft by Failure to Make Required Disposition of Property Received, as detailed in Counts Six, Thirty-Four, Forty-Seven, and Fifty-Six of this Indictment.

MONAUD TOUSSAINT

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Promoting Prostitution, as detailed in Counts Three, Five, Six, and Forty-Eight of this Indictment.

MICHAEL SMART

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Attempted Murder, as detailed in Counts Three, Six, Thirteen, and Fourteen of this Indictment.

STANLEY FOOTE

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Unlawful Disposition of a Weapon, as detailed in Counts Five, Six, and Forty-Six of this Indictment.

TERRELL WILLIAMS

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Possession with Intent to Distribute a Controlled Dangerous Substance, and Possession of a Weapon during the Commission of Certain Crimes, as detailed in Counts Six, Sixty-Four, and Sixty-Six of this Indictment.

ANDRE ARMAND

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

JEAN LENEUS

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Possession with Intent to Distribute a Controlled Dangerous Substance, as detailed in Counts Six and Sixty-Two of this Indictment.

DARIUS HUDGINS

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled

Dangerous Substance, and Theft by Receiving Stolen Property, as detailed in Counts Two, Four, Six, and Fifty-Five of this Indictment.

ALMEEN PALMER

did commit the racketeering conduct by the commission of the crimes of Murder, Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Attempted Kidnapping, Burglary, Providing a Handgun to a Person Under 21 Years of Age, Distribution of a Controlled Dangerous Substance, and Employing a Juvenile in a Narcotics Distribution Scheme, as detailed in Counts Four, Six, Ten, Eleven, Twelve, Fifteen, Sixteen, Twenty-Two, Fifty, Fifty-One, and Fifty-Two of this Indictment.

OSCAR RANDALL

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Distribution of a Controlled Dangerous Substance, Possession with Intent to Distribute a Controlled Dangerous Substance, Possession with Intent to Distribute a Controlled Dangerous Substance Within 500 Feet of Certain Public Property, and Promoting Prostitution, as detailed in Counts Two, Six, Twenty-Seven, Twenty-Eight, Twenty-Nine, Thirty, Thirty-Nine, and Fifty-Seven of this Indictment.

EDWARD WATKINS

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, and Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Counts Three and Six of this Indictment.

WILLIAM ROBINSON

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, and Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Counts Three and Six of this Indictment.

RANDOLPH BOYD

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, and Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Counts Three and Six of this Indictment.

JOSHUA HOPEWELL

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Promoting Prostitution, as detailed in Counts Three, Six, and Thirty-Nine of this Indictment.

KELSEY SMITH

did commit the racketeering conduct by the commission of the crimes of Murder, Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Attempted Kidnapping, and Burglary, as detailed in Counts Four, Six, Ten, Eleven, Twelve, Fifteen, and Sixteen of this Indictment.

QUASON BLAKE

did commit the racketeering conduct by the commission of the crimes of Murder, Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Attempted Kidnapping, and Burglary, as detailed in Counts Four, Six, Ten, Eleven, Twelve, Fifteen, and Sixteen of this Indictment.

MARVIN BUSBY

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, and Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Counts Two and Six of this Indictment.

KAHLI THOMPSON

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, and Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a

Controlled Dangerous Substance, as detailed in Counts Two and Six of this Indictment.

GERALD BUSBY

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

STEVEN ARMSTEAD

did commit the racketeering conduct by the commission of the crimes of Murder, Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Attempted Kidnapping, Burglary, and Providing a Handgun to a Person under 21 years of age, as detailed in Counts Four, Six, Ten, Eleven, Twelve, Fifteen, Sixteen, and Twenty-Two of this Indictment.

WILLIAM DAVIS

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

OCTAVIA HALL

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Commit Murder, and Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a

Controlled Dangerous Substance, as detailed in Counts Three and Six of this Indictment.

ABDUL WILLIAMS

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

EVELYN PARKER CAMPOS

did commit the racketeering conduct by the commission of the crimes of Murder, Conspiracy to Commit Murder, Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Attempted Kidnapping, and Attempted Burglary, as detailed in Counts Four, Six, Ten, Eleven, Twelve, Fifteen, and Sixteen of this Indictment.

ANTWINE HOPEWELL

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Possession with Intent to Distribute a Controlled Dangerous Substance, and Possession of a Weapon during the Commission of Certain Crimes, as detailed in Counts Six, Twenty-Three, and Twenty-Four of this Indictment.

DANUWELLI KELLER

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

KEITH BASS

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

DAVID CRAIG

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

DAKKIMAH BARNETT

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

MERVIN GRANT

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and

Unlawful Disposition of a Weapon, as detailed in Counts Six and Forty-Six of this Indictment.

OOHMANO PRINGLE

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Possession with Intent to Distribute a Controlled Dangerous Substance, as detailed in Counts Six, Fifty-Three, and Fifty-Four of this Indictment.

EDDIE GILBERT

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

NASHAUN ROBERTS

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

TYRONE BRIGGS

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

WESLEY HOWARD

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, Theft by Extortion, and Possession with Intent to Distribute a Controlled Dangerous Substance, as detailed in Counts Six, Nine, and Sixty-Seven of this Indictment.

JACQUELINE BARNETT

did commit the racketeering conduct by the commission of the crimes of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, and Possession with Intent to Distribute a Controlled Dangerous Substance, as detailed in Counts Six and Sixty-Eight of this Indictment.

DESHAWN WINSTON

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

HENRY ROSS

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

HASAN MOSELY

did commit the racketeering conduct by the commission of the crime of Conspiracy to Distribute, Possess with Intent to Distribute, and Possess a Controlled Dangerous Substance, as detailed in Count Six of this Indictment.

All in violation of N.J.S.A. 2C:5-2, N.J.S.A. 2C:41-2c, and N.J.S.A. 2C:41-2d, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Conspiracy to Commit Murder - First Degree)

OSCAR RANDALL

KAHLI THOMPSON

MARVIN BUSBY

and

DARIUS HUDGINS

between on or about April 30, 2006, and on or about July 25, 2006, at the Township of Lower, in the County of Cape May, at the Cities of Bridgeton, Millville, and Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

B. One or more of them would aid in the planning, solicitation or commission of said crime, that is:

1. Purposely to cause the death, or serious bodily injury resulting in the death of a rival gang member known as "Jigga," or knowingly to cause death or serious bodily injury resulting in the death of "Jigga," said crime being committed while OSCAR RANDALL, KAHLI THOMPSON, MARVIN BUSBY, and DARIUS HUDGINS were knowingly involved in criminal street gang related

activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3a(1) and N.J.S.A. 2C:11-3a(2).

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Conspiracy to Commit Murder - First Degree)

JAMES PRINGLE

MICHAEL SMART

WILLIAM ROBINSON

MONAUD TOUSSAINT

OCTAVIA HALL

EDWARD WATKINS

JOSHUA HOPEWELL

and

RANDOLPH BOYD

and another individual whose identity is known to the Grand Jurors, who is named as co-conspirator, but not as a defendant herein, on or about May 17, 2006, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

B. One or more of them would aid in the planning, solicitation or commission of said crime, that is:

1. Purposely to cause death or serious bodily injury resulting in death of Almeen Palmer, or knowingly to cause the

death or serious bodily injury resulting in the death of Almeen Palmer, said crime being committed while JAMES PRINGLE, MICHAEL SMART, WILLIAM ROBINSON, MONAUD TOUSSAINT, OCTAVIA HALL, EDWARD WATKINS, JOSHUA HOPEWELL, and RANDOLPH BOYD were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3a(1) and N.J.S.A. 2C:11-3a(2).

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Conspiracy to Commit Murder - First Degree)

STEVEN ARMSTEAD

ALMEEN PALMER

QUASON BLAKE

KELSEY SMITH

EVELYN PARKER CAMPOS

and

DARIUS HUDGINS

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

B. One or more of them would aid in the planning, solicitation or commission of said crime, that is:

1. Purposely to cause the death or serious bodily resulting in the death of Leroy "Pacman" Lindsey, or knowingly to cause the death or seriously bodily injury resulting in death of Leroy "Pacman" Lindsey, said crime being committed while STEVEN ARMSTEAD, ALMEEN PALMER, QUASON BLAKE, KELSEY SMITH, EVELYN PARKER CAMPOS, and DARIUS HUDGINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A.

2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3a(1) and N.J.S.A. 2C:11-3a(2).

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Conspiracy to Commit Murder - First Degree)

MONAUD TOUSSAINT

and

STANLEY FOOTE

on or about June 5, 2006, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, at the City of Elizabeth, in the County of Union, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

B. One or more of them would aid in the planning, solicitation or commission of said crime, that is:

1. Purposely to cause the death or serious bodily injury resulting in the death of T.C., or knowingly to cause death or serious bodily injury resulting in the death of T.C., said crime being committed while MONAUD TOUSSAINT, and STANLEY FOOTE were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:11-3a(2).

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Conspiracy - Second Degree)

DAVID ALLEN
TAHAIJ WELLS
EBONY MYERS
JERMAINE LITTLE
JAMES PRINGLE
EMELIO CRESPO
BISHOP BENNETT
JOHN ABBEY
MONAUD TOUSSAINT
MICHAEL SMART
STANLEY FOOTÉ
TERRELL WILLIAMS
ANDRE ARMAND
JEAN LENEUS
DARIUS HUDGINS
ALMEEN PALMER
OSCAR RANDALL
EDWARD WATKINS
WILLIAM ROBINSON
RANDOLPH BOYD
JOSHUA HOPEWELL
KELSEY SMITH

QUASON BLAKE
MARVIN BUSBY
KAHLI THOMPSON
GERALD BUSBY
STEVEN ARMSTEAD
WILLIAM DAVIS
OCTAVIA HALL
ABDUL WILLIAMS
EVELYN PARKER CAMPOS
ANTWINE HOPEWELL
DANUWELLI KELLER
KEITH BASS
DAVID CRAIG
DAKKIMAH BARNETT
MERVIN GRANT
OOHMANO PRINGLE
EDDIE GILBERT
NASHAUN ROBERTS
TYRONE BRIGGS
WESLEY HOWARD
JACQUELINE BARNETT
DESHAWN WINSTON

HENRY ROSS

and

HASAN MOSELY

and other individuals whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about February 1, 2005, and on or about November 17, 2006, at the City of Trenton, in the County of Mercer, at the Cities of Newark, Irvington, and East Orange, all in the County of Essex, at the Cities of Bridgeton, Millville and Vineland, all in the County of Cumberland, at the Cities of Atlantic City and Pleasantville, and at the Townships of Hamilton and Galloway, all in the County of Atlantic, at the Township of Dover, in the County of Morris, at the City of Paterson, in the County of Passaic, at the Township of Lower, in the County of Cape May, at the City of New York City, in the State of New York, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of distribution of a controlled dangerous substance, possession with intent to distribute a controlled dangerous substance, and possession of a controlled dangerous substance, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes; or

B. One or more of them would aid in the planning, solicitation or commission of said crimes, that is:

1. Knowingly or purposely to distribute a controlled dangerous substance, that is, heroin, in a quantity of one-half ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(2); and

2. Knowingly or purposely to possess with intent to distribute a controlled dangerous substance, that is, heroin, in a quantity of one-half ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(2); and

3. Knowingly or purposely to possess a controlled dangerous substance, that is, heroin, a Schedule I narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-10a(1); and

4. Knowingly or purposely to distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(2); and

5. Knowingly or purposely to possess with intent to distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(2); and

6. Knowingly or purposely to possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1);

Said crime being committed while DAVID ALLEN, TAHAIJ WELLS, EBONY MYERS, JERMAINE LITTLE, JAMES PRINGLE, EMELIO CRESPO, BISHOP BENNETT, JOHN ABBEY, MONAUD TOUSSAINT, MICHAEL SMART, STANLEY FOOTE, TERRELL WILLIAMS, ANDRE ARMAND, JEAN LENEUS, DARIUS HUDGINS, ALMEEN PALMER, OSCAR RANDALL, EDWARD WATKINS, WILLIAM ROBINSON, RANDOLPH BOYD, JOSHUA HOPEWELL, KELSEY SMITH, QUASON BLAKE, MARVIN BUSBY, KAHLI THOMPSON, GERALD BUSBY, STEVEN ARMSTEAD, WILLIAM DAVIS, OCTAVIA HALL, ABDUL WILLIAMS, EVELYN PARKER CAMPOS, ANTWINE HOPEWELL, DANUWELLI KELLER, KEITH BASS, DAVID CRAIG, DAKKIMAH BARNETT, MERVIN GRANT, OOHMANO PRINGLE, EDDIE GILBERT, NASHAUN ROBERTS, TYRONE BRIGGS, WESLEY HOWARD, JACQUELINE BARNETT, DESHAWN WINSTON, HENRY ROSS, and HASAN MOSELY were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h).

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Leader of Organized Crime - Second Degree)

DAVID ALLEN

between on or about March 1, 2005, and on or about July 25, 2006, at the City of Trenton, in the County of Mercer, at the Cities of Newark, Irvington, and East Orange, all in the County of Essex, at the Cities of Bridgeton, Millville, and Vineland, all in the County of Cumberland, at the Cities of Atlantic City and Pleasantville, and at the Townships of Hamilton and Galloway, all in the County of Atlantic, at the Township of Dover, in the County of Morris, at the Township of Lower, in the County of Cape May, at the City of New York City, in the State of New York, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as organizers, supervisors, managers, or financiers to commit a continuing series of crimes which constitute a pattern of racketeering activity under the provisions of N.J.S.A. 2C:41-1, contrary to the provisions of N.J.S.A. 2C:5-2g and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Leader of Narcotics Trafficking Network - First Degree)

DAVID ALLEN

JERMAINE LITTLE

and

JAMES PRINGLE

between on or about February 1, 2006, and on or about July 25, 2006, at the City of Trenton, in the County of Mercer, at the Cities of Newark, Irvington, and East Orange, all in the County of Essex, at the Cities of Bridgeton, Millville, and Vineland, all in the County of Cumberland, at the Cities of Atlantic City and Pleasantville, and at the Townships of Hamilton and Galloway, all in the County of Atlantic, at the Township of Dover, in the County of Morris, at the Township of Lower, in the County of Cape May, at the City of New York City, in the State of New York, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as organizers, supervisors, financiers, or managers, to engage for profit in a scheme or course of conduct to unlawfully manufacture, distribute, bring into or transport in this State cocaine, a Schedule II controlled dangerous substance, and heroin and marijuana, both Schedule I controlled dangerous substances, said crime being committed while DAVID ALLEN, JERMAINE LITTLE, and JAMES PRINGLE were knowingly involved in criminal street gang related activity as defined in

N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A.
2C:35-3 and N.J.S.A. 2C:2-6, and against the peace of this State,
the government and dignity of the same.

COUNT NINE

(Theft by Extortion - Second Degree)

DAVID ALLEN

BISHOP BENNETT

and

WESLEY HOWARD

between on or about November 10, 2005, and on or about November 17, 2006, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this court, purposely did obtain by extortion property of L.G., that is, the Mo Better Unisex Salon, by purposely threatening to inflict bodily injury on L.G., or commit any other criminal offense, said crime being committed while DAVID ALLEN, BISHOP BENNETT, and WESLEY HOWARD were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Murder - First Degree)

STEVEN ARMSTEAD

ALMEEN PALMER

QUASON BLAKE

KELSEY SMITH

and

EVELYN PARKER CAMPOS

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, purposely did cause the death or serious bodily injury resulting in the death of Leroy "Pacman" Lindsey, or knowingly did cause death death or serious bodily injury resulting in the death of Leroy "Pacman" Lindsey, said crime being committed while STEVEN ARMSTEAD, ALMEEN PALMER, QUASON BLAKE, KELSEY SMITH, and EVELYN PARKER CAMPOS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3(a)(1) and N.J.S.A. 2C:11-3(a)(2), and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Felony Murder - First Degree)

STEVEN ARMSTEAD

ALMEEN PALMER

QUASON BLAKE

KELSEY SMITH

and

EVELYN PARKER CAMPOS

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, acting alone or with one or more persons did cause the death of Leroy "Pacman" Lindsey during the commission of the crimes of attempted kidnapping, said crime being committed while STEVEN ARMSTEAD, ALMEEN PALMER, QUASON BLAKE, KELSEY SMITH, and EVELYN PARKER CAMPOS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3a(3), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Felony Murder - First Degree)

STEVEN ARMSTEAD

ALMEEN PALMER

QUASON BLAKE

KELSEY SMITH

and

EVELYN PARKER CAMPOS

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, acting alone or with one or more persons, did cause the death of Leroy "Pacman" Lindsey during the commission of the crimes of burglary, said crime being committed while STEVEN ARMSTEAD, ALMEEN PALMER, QUASON BLAKE, KELSEY SMITH, and EVELYN PARKER CAMPOS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3a(3), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Attempted Murder - First Degree)

JAMES PRINGLE

and

MICHAEL SMART

on or about May 3, 2006, at the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of C.E., said crime being committed while JAMES PRINGLE and MICHAEL SMART were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3, N.J.S.A. 2C:5-1, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Attempted Murder - First Degree)

MICHAEL SMART

on or about May 4, 2006, in the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of A.C., said crime being committed while MICHAEL SMART was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3 and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Attempted Kidnapping - First Degree)

STEVEN ARMSTEAD

ALMEEN PALMER

QUASON BLAKE

KELSEY SMITH

and

EVELYN PARKER CAMPOS

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, purposely did attempt to unlawfully remove Leroy "Pacman" Lindsey from his place of residence with the purpose to inflict bodily injury on or to terrorize Leroy "Pacman" Lindsey, said crime being committed while STEVEN ARMSTEAD, ALMEEN PALMER, QUASON BLAKE, KELSEY SMITH, and EVELYN PARKER CAMPOS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:13-1b and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Burglary - Second Degree)

STEVEN ARMSTEAD

ALMEEN PALMER

QUASON BLAKE

KELSEY SMITH

and

EVELYN PARKER CAMPOS

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, purposely did enter the structure of Leroy "Pacman" Lindsey at a second floor apartment located at 615 South Seventh Street, Vineland, New Jersey, with the purpose to commit an offense therein, and in the course of committing said offense, were armed with a deadly weapon or purposely, knowingly, or recklessly did inflict bodily injury upon Leroy "Pacman" Lindsey, said crime being committed while STEVEN ARMSTEAD, ALMEEN PALMER, QUASON BLAKE, KELSEY SMITH, and EVELYN PARKER CAMPOS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

STEVEN ARMSTEAD

ALMEEN PALMER

QUASON BLAKE

and

KELSEY SMITH

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did possess a firearm, that is, a .38 Special Colt revolver, Serial Number 810127, or a .357 Magnum Colt revolver, Serial Number 58977E, with purpose to use it unlawfully against the person or property of another, said crime being committed while STEVEN ARMSTEAD, ALMEEN PALMER, QUASON BLAKE, and KELSEY SMITH were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-4(a), and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Unlawful Possession of a Weapon - Third Degree)

STEVEN ARMSTEAD

ALMEEN PALMER

QUASON BLAKE

KELSEY SMITH

and

MICHAEL EVERETT

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a .38 Special Colt revolver, Serial Number 810127, or a .357 Magnum Colt revolver, Serial Number 58977E, without first having obtained permits to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while STEVEN ARMSTEAD, ALMEEN PALMER, QUASON BLAKE, and KELSEY SMITH, were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-4(a), and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Hindering Prosecution - Third Degree)

MICHAEL EVERETT

STEVEN ARMSTEAD

ALMEEN PALMER

QUASON BLAKE

and

KELSEY SMITH

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with purpose to hinder their own apprehension, prosecution, conviction or punishment, did suppress, by way of concealment or destruction, any evidence of the crime, regardless of the admissibility in evidence, which might aid in their discovery or apprehension, or in the lodging of a charge against said defendants, said crime being committed while STEVEN ARMSTEAD, ALMEEN PALMER, QUASON BLAKE, and KELSEY SMITH were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provision of N.J.S.A. 2C:29-3b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Hindering Prosecution - Third Degree)

EVELYN PARKER CAMPOS

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with purpose to hinder the apprehension, prosecution, conviction or punishment of other persons, that is, Steven Armstead, Almeen Palmer, Quason Blake, and Kelsey Smith, did provide or aid in providing transportation or other means of avoiding discovery or apprehension, or effecting escape, said crime being committed while EVELYN PARKER CAMPOS was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provision of N.J.S.A. 2C:29-3a(2), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Hindering Prosecution - Third Degree)

MICHAEL EVERETT

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with purpose to hinder the apprehension, prosecution, conviction or punishment of another person, that is, Steven Armstead, did suppress, by way of concealment or destruction, any evidence of the crime, regardless of the admissibility in evidence, which might aid in the discovery or apprehension of the said Steven Armstead, or in the lodging of a charge against the said Steven Armstead, contrary to the provision of N.J.S.A. 2C:29-3a(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Providing a Handgun to a Person
Under 21 Years of Age - Third Degree)

STEVEN ARMSTEAD

and

ALMEEN PALMER

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, knowingly did give, transfer, assign or otherwise dispose of a firearm, that is, a .38 Special Colt revolver, Serial Number 810127, or a .357 Magnum Colt revolver, Serial Number 58977E, to a person under the age of 21 years, namely Quason Blake or Kelsey Smith, said crime being committed while STEVEN ARMSTEAD and ALMEEN PALMER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-10(f), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Possession with Intent to Distribute a
Controlled Dangerous Substance - Third Degree)

ANTWINE HOPEWELL

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, said crime being committed while ANTWINE HOPEWELL was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Possession with Intent to Distribute a
Controlled Dangerous Substance - Third Degree)

ANTWINE HOPEWELL

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, said crime being committed while ANTWINE HOPEWELL was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Hindering Prosecution - Fourth Degree)

ANTWINE HOPEWELL

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with purpose to hinder his own apprehension, prosecution, conviction or punishment, did suppress, by way of concealment or destruction, any evidence of the crime, regardless of the admissibility in evidence, which might aid in his discovery or apprehension, or in the lodging of a charge against said defendant, said crime being committed while ANTWINE HOPEWELL was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provision of N.J.S.A. 2C:29-3b(1), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Possession of Weapons during Commission
of Certain Crimes - Second Degree)

ANTWINE HOPEWELL

on or about January 23, 2006, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did possess a firearm, that is, a .22 caliber Harrington & Richardson handgun, Serial Number AE48075, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, said crime being committed while ANTWINE HOPEWELL was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-4.1(a), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Distribution of a Controlled
Dangerous Substance - Third Degree)

OSCAR RANDALL

on or about March 5, 2006, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, said crime being committed while OSCAR RANDALL was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Distribution of a Controlled
Dangerous Substance -Third Degree)

OSCAR RANDALL

on or about March 8, 2006, at the City of Pleasantville, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, said crime being committed while OSCAR RANDALL was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Possession with Intent to Distribute a
Controlled Dangerous Substance - Third Degree)

OSCAR RANDALL

on or about March 12, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Possession with Intent to Distribute a
Controlled Dangerous Substance within 500 Feet
of Certain Public Property - Second Degree)

OSCAR RANDALL

on or about March 12, 2006, at the City of Atlantic City, in the County of Atlantic, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Westside Public Park, said crime being committed while OSCAR RANDALL was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Solicitation, Recruitment to Join a
Criminal Street Gang - Fourth Degree)

ALMEEN PALMER

MONAUD TOUSSAINT

and

OSCAR RANDALL

on or about March 12, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, did solicit or recruit others to join or actively participate in a criminal street gang with the knowledge or purpose that the persons solicited or recruited would promote, further, assist, plan, aid agree, or attempt to aid in the commission of criminal conduct, contrary to the provisions of N.J.S.A. 2C:33-28(a), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Possession of a Prohibited Weapon - Fourth Degree)

OSCAR RANDALL

on or about March 12, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, metal knuckles, without any explainable lawful purpose, said crime being committed while OSCAR RANDALL was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-3e, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Aggravated Assault - Third Degree)

OSCAR RANDALL

KAHLI THOMPSON

and

MARVIN BUSBY

on or about April 21, 2006, at the Township of Hamilton, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury, or under circumstances manifesting extreme indifference to the value of human life recklessly caused such significant bodily injury to D.M., said crime being committed while OSCAR RANDALL, KAHLI THOMPSON, and MARVIN BUSBY were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:12-1b(1), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Unlawful Disposition of a Weapon - Fourth Degree)

JOHN ABBEY

on or about May 1, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did sell or dispose of a firearm, that is, a .45 caliber Taurus pistol, without being licensed or registered to do so as provided in N.J.S.A. 2C:58-1, et seq., said crime being committed while JOHN ABBEY was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Possession of a Controlled Dangerous Substance - Third Degree)

OSCAR RANDALL

and

MARVIN BUSBY

on or about May 3, 2006, at the Township of Galloway, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Possession of a Weapon for
an Unlawful Purpose - Second Degree)

MICHAEL SMART

on or about May 4, 2006, at the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did possess a firearm, that is, a .40 caliber handgun, with purpose to use it unlawfully against the person or property of another, that is, A.C., said crime being committed while MICHAEL SMART was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-4(a), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SEVEN

(Unlawful Possession of a Weapon - Third Degree)

MICHAEL SMART

on or about May 4, 2006, at the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a .40 caliber handgun, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while MICHAEL SMART was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-5(b), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-EIGHT

(Hindering Apprehension or Prosecution - Third Degree)

JAMES PRINGLE

MONAUD TOUSSAINT

JOHN ABBEY

and

ALMEEN PALMER

between on or about May 4, 2006, and on or about May 17, 2006, at the City of Newark, in the County of Essex, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, with purpose to hinder the detention, apprehension, prosecution, conviction or punishment of MICHAEL SMART for an offense, did harbor or conceal or provide aid in providing money, transportation, disguise or other means of avoiding discovery or apprehension or effecting the escape of said MICHAEL SMART, said crime being committed while MICHAEL SMART, JAMES PRINGLE, MONAUD TOUSSAINT, JOHN ABBEY, and ALMEEN PALMER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:29-3a, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Promoting Prostitution - Third Degree)

JOSHUA HOPEWELL

and

OSCAR RANDALL

on or about April 4, 2006, at the City of Atlantic City, in the County of Atlantic, at the Township of Lower, in the County of Cape May, elsewhere, and within the jurisdiction of this Court, knowingly did promote prostitution by owning, controlling, supervising or otherwise keeping, alone or in association with another, a prostitution business, said crime being committed while JOSHUA HOPEWELL and OSCAR RANDALL were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:34-1b(2), and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Possession of a Weapon for an
Unlawful Purpose - Second Degree)

JAMES PRINGLE

MICHAEL SMART

WILLIAM ROBINSON

MONAUD TOUSSAINT

OCTAVIA HALL

EDWARD WATKINS

JOSHUA HOPEWELL

and

RANDOLPH BOYD

on or about May 17, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, did possess a firearm, that is, a Ruger .38 caliber handgun, or a .22 caliber semi-automatic handgun, with purpose to use it unlawfully against the person or property of another, that is, Almeen Palmer, said crime being committed while JAMES PRINGLE, MICHAEL SMART, WILLIAM ROBINSON, MONAUD TOUSSAINT, OCTAVIA HALL, EDWARD WATKINS, JOSHUA HOPEWELL, and RANDOLPH BOYD were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-4(a), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-ONE

(Unlawful Possession of a Weapon - Third Degree)

JAMES PRINGLE

MICHAEL SMART

WILLIAM ROBINSON

MONAUD TOUSSAINT

OCTAVIA HALL

EDWARD WATKINS

JOSHUA HOPEWELL

and

RANDOLPH BOYD

on or about May 17, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a handgun, that is, a Ruger .38 caliber handgun, or a .22 caliber semi-automatic handgun, without having first obtained a permit to carry same as provided by N.J.S.A. 2C:58-4, said crime being committed while JAMES PRINGLE, MICHAEL SMART, WILLIAM ROBINSON, MONAUD TOUSSAINT, OCTAVIA HALL, EDWARD WATKINS, JOSHUA HOPEWELL, and RANDOLPH BOYD were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

(Possession of a Prohibited Weapon - Third Degree)

MICHAEL SMART

on or about May 17, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a hollow-point bullet, said crime being committed while MICHAEL SMART was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-3(f), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-THREE

(Aggravated Assault - Third Degree)

MICHAEL SMART

on or about May 17, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did, under circumstances manifesting extreme indifference to the value of human life, point or display a firearm at or in the direction of a law enforcement officer, namely Atlantic City Police Officer D.H., said crime being committed while MICHAEL SMART was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:12-1b(9), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FOUR

(Purposeful Injury to Animals Used for Law
Enforcement - Fourth Degree)

MICHAEL SMART

on or about May 17, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, purposely did inflict harm upon a dog owned or used by a law enforcement agency, namely Atlantic City K-9 Police dog Nitro, said crime being committed while MICHAEL SMART was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:29-3.1, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FIVE

(Resisting Arrest - Fourth Degree)

MICHAEL SMART

on or about May 17, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, purposely did prevent Patrolman D.H. and K-9 Police dog Nitro, law enforcement officers of the Atlantic City Police Department, from effecting a lawful arrest by using or threatening to use physical force or violence against Patrolman D.H. and K-9 Police dog Nitro, said crime being committed while MICHAEL SMART was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provision of N.J.S.A. 2C:29-2a, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SIX

(Unlawful Disposition of a Weapon - Fourth Degree)

STANLEY FOOTE

and

MERVIN GRANT

between on or about May 25, 2006, and on or about May 26, 2006, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did sell or dispose of a firearm, that is, a Forjas .38 caliber revolver, Taurus model, and a Lorcin .22 caliber semi-automatic handgun, without being licensed or registered to do so as provided in N.J.S.A. 2C:58-1, et seq., said crime being committed while STANLEY FOOTE and MERVIN GRANT were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-9d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SEVEN

(Money Laundering - Second Degree)

JOHN ABBEY

between on or about June 1, 2006, and on or about July 25, 2006, at the City of Atlantic City, at the Township of Hamilton, and at the Township of Galloway, all in the County of Atlantic, at the Township of Little Egg Harbor, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, did transport or possess property known to be derived from criminal activity, or engaged in transactions involving property known to be derived from criminal activity with the intent to facilitate or promote the criminal activity, or knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the property derived from criminal activity, or directed, managed, controlled or transported property known to be derived from criminal activity, namely a total of \$83,500 in U.S. currency, said crime being committed while JOHN ABBEY was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b(1), and N.J.S.A. 2C:21-25b(2), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-EIGHT

(Promoting Prostitution - Third Degree)

MONAUD TOUSSAINT

between on or about June 10, 2006, and on or about June 23, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did promote prostitution by encouraging, inducing or otherwise purposely causing another to become or remain a prostitute, said crime being committed while MONAUD TOUSSAINT was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:34-1b(2), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-NINE

(Distribution of a Controlled
Dangerous Substance - Second Degree)

EMELIO CRESPO

on or about June 19, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more including any adulterants or dilutants, said crime being committed while EMELIO CRESPO was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(2), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY

(Distribution of a Controlled
Dangerous Substance - Third Degree)

ALMEEN PALMER

on or about June 23, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, said crime being committed while ALMEEN PALMER was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-ONE

(Distribution of a Controlled
Dangerous Substance - Third Degree)

ALMEEN PALMER

on or about June 27, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, said crime being committed while ALMEEN PALMER was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-TWO

(Employing a Juvenile in a
Drug Distribution Scheme - Second Degree)

ALMEEN PALMER

being at least 18 years of age, between on or about June 23, 2006, and on or about June 27, 2006, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did use, solicit, direct, hire or employ a person 17 years of age or younger, that is, R.W., to violate N.J.S.A. 2C:35-4 or N.J.S.A. 2C:35-5a, said crime being committed while ALMEEN PALMER was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-THREE

(Possession with Intent to Distribute a
Controlled Dangerous Substance - Third Degree)

JAMES PRINGLE

and

OOHMANO PRINGLE

on or about July 7, 2006, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, said crime being committed while JAMES PRINGLE and OOHMANO PRINGLE were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FOUR

(Possession with Intent to Distribute a
Controlled Dangerous Substance - Fourth Degree)

JAMES PRINGLE

and

OOHMANO PRINGLE

on or about July 7, 2006, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, marijuana, said crime being committed while JAMES PRINGLE and OOHMANO PRINGLE were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1), 2C:35-5b(12), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FIVE

(Theft by Receiving Stolen Property - Third Degree)

DARIUS HUDGINS

on or about July 17, 2006, at the Township of Dover, in the County of Morris, elsewhere, and within the jurisdiction of this Court, did commit theft by knowingly receiving or bringing into this State movable property of L.E., namely a firearm, that is, a .45 caliber Colt semi-automatic handgun, Serial number FN07550, knowing the same to be stolen or believing that it had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7 and N.J.S.A. 2C:20-2b(2) (b), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SIX

(Theft by Failure to Make Required Disposition
of Property Received - Second Degree)

JOHN ABBEY

between on or about July 22, 2006, and on or about November 22, 2006, at the City of Atlantic City, and at the Township of Hamilton, both in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, did commit theft by purposely obtaining or retaining property, that is \$81,500 in United States currency, upon agreement or subject to a known legal obligation to make specified payment or other disposition and did deal with the said \$81,500 in United States currency as his own and did fail to make the required payment or disposition, said crime being committed while JOHN ABBEY was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:20-9, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SEVEN

(Possession with Intent to Distribute a
Controlled Dangerous Substance - Third Degree)

OSCAR RANDALL

on or about July 25, 2006, at the Township of Lower, in the County of Cape May, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, said crime being committed while OSCAR RANDALL was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

