

SUPERIOR COURT OF N.J.
FILED

JUN 07 2007

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.

