

SUPERIOR COURT OF NJ
FILED

JUL 08 2008

Christian P. Higgins
Acting Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ557-08-6
Superior Court
Docket Number 08-07-00163-S

STATE OF NEW JERSEY)

v.)

DIONICIO ADAMS)
also known as)
DION)
also known as)
DO)

MICHAEL ANDERSON)
also known as)
RED)
also known as)
RED EYES)

HECTOR ARCHEVAL)
also known as)
GREEN EYES)

NATHANIEL CLAY)
also known as)
FINESSE)

JOSE FIGUEROA)

JAVIEL FORD)
also known as)
G.A.)

KEITH JONES)
also known as)
SPOONEY)

BRIAN KEEN)

RONA MCLAUGHLIN)

JACK MOORE)

MICHELE OCCASIO)

ORDER OF VENUE

██████████)
also known as)
SIS)

JOSE J. VARGAS)

JUAN VARGAS)
also known as)
JUANITO)
also known as)
BIG BRO)

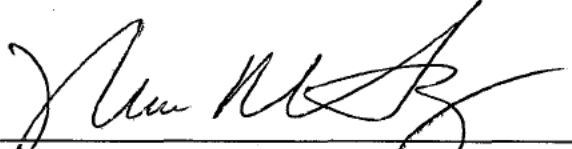
and)

FAQUIR WILLIAMSON)
also known as)
FA)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 8th day of July, 2008, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Union be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Union for filing.



Linda R. Feinberg, A.J.S.C.
Maria Marinari Sypek, J.S.C.

SUPERIOR COURT OF N.J.
FILED

JUL 08 2008

Christina P. Dwyer
Acting Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

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G.A.)

KEITH JONES)

also known as)

SPOONEY)

BRIAN KEEN)

RONA MCLAUGHLIN)

JACK MOORE)

MICHELE OCCASIO)

INDICTMENT

██████████)
also known as)
SIS)
JOSE J. VARGAS)
JUAN VARGAS)
also known as)
JUANITO)
also known as)
BIG BRO)
and)
FAQUIR WILLIAMSON)
also known as)
FA)

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

COUNT ONE

(Racketeering - First Degree)

- DIONICIO ADAMS
- MICHAEL ANDERSON
- HECTOR ARCHEVAL
- NATHANIEL CLAY
- JAVIEL FORD
- KEITH JONES
- JUAN VARGAS

and

FAQUIR WILLIAMSON

who are named as defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, who

are named as co-conspirators but not as defendants herein, at the times and places hereinafter specified, did commit the crime of racketeering, that is, the defendants and other persons employed by or associated with the enterprise engaged in or the activities of which affected trade or commerce in the State of New Jersey, purposely or knowingly did conduct or participate directly or indirectly in the conduct of the enterprise's affairs through a pattern of racketeering activity, 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 and 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 October 30, 2003, and on or about January 11, 2008, at the City of Newark, in the County of Essex, at the City of Camden, in the County of Camden, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court.

The Enterprise

DIONICIO ADAMS, MICHAEL ANDERSON, HECTOR ARCHEVAL, NATHANIEL CLAY, JAVIEL FORD, KEITH JONES, JUAN VARGAS, FAQUIR WILLIAMSON, and other persons whose identities are both 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 Tre Headbustas set of the Bloods Street gang (hereinafter referred to as the Nine Tre Headbustas).

The Purposes of the Enterprise

The purposes of the enterprise included the following:

A. The obtaining of money for members and associates of the enterprise through the commission of the crimes of leader of narcotics trafficking network, distribution of controlled dangerous substances, possession with intent to distribute controlled dangerous substances, and employing a juvenile in a drug distribution scheme.

B. The protection of members and associates of the enterprise as well as protection of lucrative drug sets and other territory controlled by the Nine Tre Headbustas through violence and the threat of violence.

C. Perpetuating the enterprise through an organized and structured chain of command and rank structure, with rules and regulations, and a process for disciplining members who violated the chain of command or rules and regulations, including the commission of violations of the laws of the State of New Jersey, including the commission of crimes of violence, and crimes involving the use of firearms.

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 conduct, including Leader of Narcotics Trafficking Network (N.J.S.A. 2C:35-3), Murder (N.J.S.A. 2C:11-3), 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), Distribution of Controlled Dangerous Substances On or Near 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 Twenty-Six of this Indictment.

DIONICIO ADAMS

did commit the racketeering conduct by engaging in and or conspiring to commit the crimes of Murder, Distribution and Possession with Intent to Distribute a Controlled Dangerous Substance, and Employing a Juvenile in a Drug Distribution Scheme, as detailed in Counts Three, Four, Five, Thirteen, Fourteen, Fifteen, and Seventeen of this Indictment.

MICHAEL ANDERSON

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Leader of Narcotics Trafficking Network,

Murder, and Distribution and Possession with Intent to Distribute a Controlled Dangerous Substance, as detailed in Counts Two, Five, Ten, Eleven, Twelve, and Seventeen of this Indictment.

HECTOR ARCHEVAL

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution and Possession with Intent to Distribute a Controlled Dangerous Substance, as detailed in Counts Five, Thirteen, Fourteen, and Fifteen of this Indictment.

NATHANIEL CLAY

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Murder, Distribution and Possession with Intent to Distribute a Controlled Dangerous Substance, Employing a Juvenile in a Drug Distribution Scheme, Possession of a Weapon for an Unlawful Purpose, and Possession of a Weapon by Certain Persons, as detailed in Counts Three, Four, Five, Seven, Ten, Eleven, Twelve, Nineteen, and Twenty-Six of this Indictment.

JAVIEL FORD

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution and Possession with Intent to Distribute a Controlled Dangerous Substance, and Possession with Intent to Distribute a Controlled Dangerous Substance within 500 Feet of Certain Public Property, as detailed in Counts Five, Twenty-Four, and Twenty-Five of this Indictment.

KEITH JONES

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution and Possession with Intent to Distribute a Controlled Dangerous Substance, as detailed in Counts Five and Six of this Indictment.

JUAN VARGAS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Leader of Narcotics Trafficking Network, Murder, Distribution and Possession with Intent to Distribute a Controlled Dangerous Substance, and Employing a Juvenile in a Drug Distribution Scheme, as detailed in Counts Two, Three, Five, and Seventeen of this Indictment.

FAQUIR WILLIAMSON

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution and Possession with Intent to Distribute a Controlled Dangerous Substance, as detailed in Counts Five, Ten, Eleven, and Twelve of this Indictment.

All in violation of 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

(Leader of Narcotics Trafficking Network - First Degree)

MICHAEL ANDERSON

and

JUAN VARGAS

between on or about November 1, 2006, and on or about January 11, 2008, at the City of Newark, in the County of Essex, at the City of Camden, in the County of Camden, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with two or more other persons 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 heroin and cocaine, Schedule I and Schedule II controlled dangerous substances, respectively, contrary to the provisions of N.J.S.A. 2C:35-3, and against the peace of this State, the government and dignity of the same.

COUNT THREE

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

DIONICIO ADAMS

NATHANIEL CLAY

and

JUAN VARGAS

being at least 18 years of age, between on or about July 1, 2007, and on or about January 11, 2008, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did use, solicit, direct, hire or employ persons 17 years of age or younger, that is, N.C., E.R., and A.W., to violate N.J.S.A. 2C:35-5a, contrary to the provisions of N.J.S.A. 2C:35-6 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Conspiracy to Commit Murder - First Degree)

DIONICIO ADAMS

and

NATHANIEL CLAY

on or about October 27, 2007, at the City of Camden, in the County of Camden, 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 death of M.F., or knowingly to cause death or serious bodily injury resulting in the death of M.F., 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 - Second Degree)

DIONICIO ADAMS

MICHAEL ANDERSON

HECTOR ARCHEVAL

NATHANIEL CLAY

JAVIEL FORD

KEITH JONES

JUAN VARGAS

and

FAQUIR WILLIAMSON

who are named as the defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about November 1, 2007, and on or about January 11, 2008, at the City of Camden, in the County of Camden, at the City of Trenton, in the County of Mercer, 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 and possession with intent to distribute 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).

3. 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

4. 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).

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

(Distribution of a Controlled Dangerous
Substance - Third Degree)

KEITH JONES

between on or about November 1, 2007, and on or about
December 13, 2007, at the City of Camden, in the County of
Camden, elsewhere, and within the jurisdiction of this Court,
knowingly or purposely did distribute a controlled dangerous
substance, that is, heroin, contrary to the provisions of
N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3) and N.J.S.A. 2C:35-5c,
and against the peace of this State, the government and dignity
of the same.

COUNT SEVEN

(Conspiracy - Second Degree)

NATHANIEL CLAY

and

JOSE FIGUEROA

between on or about November 1, 2007, and on or about November 20, 2007, at the City of Camden, in the County of Camden, 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 and possession with intent to distribute 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, cocaine, in a quantity of five ounces 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(1); and

2. Knowingly or purposely to possess with intent to distribute a controlled dangerous substance, that is, cocaine, in a quantity of five ounces 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(1).

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 EIGHT

(Distribution of a Controlled
Dangerous Substance - First Degree)

JOSE FIGUEROA

between on or about November 1, 2007, and on or about
November 20, 2007, at the City of Camden, in the County of
Camden, elsewhere, and within the jurisdiction of this Court,
knowingly or purposely did distribute a controlled dangerous
substance, that is, cocaine, in an aggregate quantity of five
ounces or more including any adulterants or dilutants, contrary
to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1),
and N.J.S.A. 2C:35-5c, and against the peace of this State, the
government and dignity of the same.

COUNT NINE

(Distribution of a Controlled Dangerous Substance on or within 1,000 Feet of School Property - Third Degree)

JOSE FIGUEROA

between on or about November 1, 2007, and on or about November 20, 2007, at the City of Camden, in the County of Camden, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the Broadway Elementary School, which is owned by or leased to the Camden Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Conspiracy - Second Degree)

MICHAEL ANDERSON

NATHANIEL CLAY



and

FAQUIR WILLIAMSON

between on or about November 9, 2007, and on or about November 11, 2007, at the City of Newark, in the County of Essex, at the City of Camden, in the County of Camden, at the City of Trenton, in the County of Mercer, 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 and possession with intent to distribute 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, 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

2. 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).

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 ELEVEN

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

MICHAEL ANDERSON

NATHANIEL CLAY

[REDACTED]

and

FAQUIR WILLIAMSON

on or about November 11, 2007, at the City of Camden, in the County of Camden, 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, 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), N.J.S.A. 2C:35-5b(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Distribution of a Controlled Dangerous
Substance - Second Degree)

MICHAEL ANDERSON

NATHANIEL CLAY

[REDACTED]

and

FAQUIR WILLIAMSON

on or about November 11, 2007, at the City of Camden, in the County of Camden, 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, 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), N.J.S.A. 2C:35-5b(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Conspiracy - Third Degree)

DIONICIO ADAMS

HECTOR ARCHEVAL

BRIAN KEEN

and

JACK MOORE

on or about November 22, 2007, at the City of Camden, in the County of Camden, 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 and possession with intent to distribute 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, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3); and

2. Knowingly or purposely to 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).

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 FOURTEEN

(Distribution of a Controlled Dangerous
Substance - Third Degree)

DIONICIO ADAMS

and

HECTOR ARCHEVAL

on or about November 22, 2007, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, including any adulterants or dilutants (including cocaine), contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

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

DIONICIO ADAMS

HECTOR ARCHEVAL

BRIAN KEEN

and

JACK MOORE

on or about November 22, 2007, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, including any adulterants or dilutants (including cocaine), contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Distribution of a Controlled Dangerous
Substance - Third Degree)

RONA MCLAUGHLIN

on or about November 22, 2007, at the City of Camden, in the
County of Camden, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, cocaine, 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 SEVENTEEN

(Conspiracy to Commit Murder - First Degree)

DIONICIO ADAMS

MICHAEL ANDERSON

and

JUAN VARGAS

between on or about November 25, 2007, and on or about November 29, 2007, at the City of Camden, in the County of Camden, at the City of Trenton, in the County of Mercer, 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 death of N.C., or knowingly to cause death or serious bodily injury resulting in the death of N.C., 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 EIGHTEEN

(Aggravated Assault - Second Degree)

NATHANIEL CLAY

and

JAVIEL FORD

on or about November 25, 2007, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause bodily injury, or purposely or knowingly did cause bodily injury to another, that is, N.C., with a deadly weapon, contrary to the provisions of N.J.S.A. 2C:12-1b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

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

NATHANIEL CLAY

on or about November 25, 2007, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a .40 caliber Glock, Model 22 handgun, with the purpose to use it unlawfully against the person of another, namely N.C., contrary to the provisions of N.J.S.A. 2C:39-4a, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

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

JOSE VARGAS

on or about November 29, 2007, at the City of Camden, in the
County of Camden, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did possess with intent to
distribute a controlled dangerous substance, that is, marijuana,
in a quantity of one 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(11), and against the peace of this State, the
government and dignity of the same.

COUNT TWENTY-ONE

(Possession with Intent to Distribute a Controlled
Dangerous Substance on or within 1,000 Feet of
School Property - Third Degree)

JOSE VARGAS

on or about November 29, 2007, at the City of Camden, in the
County of Camden, and within the jurisdiction of this Court,
knowingly or purposely did possess with intent to distribute a
controlled dangerous substance, that is, marijuana, in a quantity
of one ounce or more including any adulterants or dilutants, in
violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the
Broadway Elementary School, which is owned by or leased to the
Camden Board of Education and used for school purposes, contrary
to the provisions of N.J.S.A. 2C:35-7, and against the peace of
this State, the government and dignity of the same.

COUNT TWENTY-TWO

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

MICHELE OCCASIO

on or about November 29, 2007, at the City of Camden, in the
County of Camden, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did possess with intent to
distribute a controlled dangerous substance, that is, marijuana,
in a quantity of one 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(11), 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 on or within 1,000 Feet of
School Property - Third Degree)

MICHELE OCCASIO

on or about November 29, 2007, at the City of Camden, in the
County of Camden, and within the jurisdiction of this Court,
knowingly or purposely did possess with intent to distribute a
controlled dangerous substance, that is, marijuana, in a quantity
of one ounce or more including any adulterants or dilutants, in
violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the
Broadway Elementary School, which is owned by or leased to the
Camden Board of Education and used for school purposes, contrary
to the provisions of N.J.S.A. 2C:35-7, 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 - Second Degree)

JAVIEL FORD

on or about November 29, 2007, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did 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 (including cocaine), 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 TWENTY-FIVE

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

JAVIEL FORD

on or about November 29, 2007, at the City of Camden, in the
County of Camden, 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 certain public
property, that is, the Camden City Free Public Library, 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 TWENTY-SIX

(Possession of a Weapon by
Certain Persons - Second Degree)

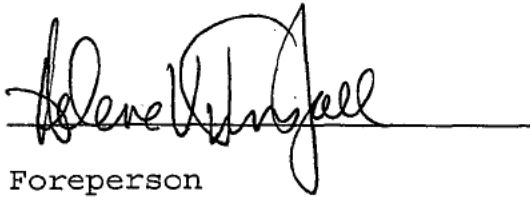
NATHANIEL CLAY

on or about November 29, 2007, at the City of Camden, in the
County of Camden, elsewhere, and within the jurisdiction of this
Court, having been convicted of the crime of aggravated assault,
on Camden County Indictment number 03-01-00010, did possess or
control a firearm, that is, a .40 caliber Glock, Model 22
handgun, contrary to the provisions of N.J.S.A. 2C:39-7(b)(1),
and against the peace of this State, the government and dignity
of the same.



AAG Deborah L. Gramiccioni
Acting Director
Division of Criminal Justice

A TRUE BILL:


Foreperson

Dated: 7/8/08