

FILED

NOV 10 2010

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ598-10-1(1)

Superior Court

Docket Number 10-11-00158-S

STATE OF NEW JERSEY)

v.)

TUAN DANG,)

AKA "LEE TRAN,")

AKA "TRAN LEE,")

AKA "LEE VU")

NGOC BUI,)

AKA "HANG BUI")

and)

THU NUGYEN)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

TUAN DANG

NGOC BUI

and

THU NUGYEN

between on or about January 1, 2007, and on or about February 20, 2010, at the Township of Stafford, in the County of Ocean, at the Township of Millstone, in the County of Monmouth, at the Townships of Monroe and Old Bridge, both in the County of Middlesex, elsewhere, and within the jurisdiction of this Court,

with the purpose of promoting or facilitating the commission of the crimes of maintaining or operating a controlled dangerous substance production facility, manufacturing a controlled dangerous substance, and distribution of a controlled dangerous substance, did agree that:

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

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

1. Knowingly or purposely to maintain or operate a controlled dangerous substance production facility, used for the manufacture of marijuana in an amount greater than five pounds or ten plants, or knowingly to aid, promote, finance, or otherwise participate in the maintenance or operations of such premises, place or facility, contrary to the provisions of N.J.S.A.

2C:35-4.

2. Knowingly or purposely to manufacture a controlled dangerous substance, that is, marijuana, in a quantity of fifty or more marijuana plants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(10).

3. Knowingly or purposely to distribute a controlled dangerous substance, that is, marijuana, in a quantity of twenty-five pounds 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(10).

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 TWO

(Leader of Narcotics Trafficking Network - First Degree)

TUAN DANG

between on or about January 1, 2007, and on or about February 20, 2010, at the Township of Stafford, in the County of Ocean, at the Townships of Millstone, Manalapan, and Middletown, all in the County of Monmouth, at the Townships of Monroe and Old Bridge, both in the County of Middlesex, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier or manager, to engage for profit in a scheme or course of conduct to unlawfully distribute, dispense, bring into or transport in this State controlled dangerous substances, that is, marijuana, a Schedule I controlled dangerous substance, 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

(Maintaining or Operating a Controlled Dangerous
Substance Production Facility - First Degree)

TUAN DANG

THU NGUYEN

and

NGOC BUI

between on or about September 1, 2008, and on or about
February 18, 2010, at the Township of Monroe, in the County of
Middlesex, elsewhere, and within the jurisdiction of this Court,
knowingly did maintain or operate a premises, place or facility,
that is, a residence located at 558 Spotswood-Englishtown Road,
Monroe Township, New Jersey, used for the manufacture of
marijuana in an amount greater than five pounds or ten plants, or
knowingly did aid, promote, finance, or otherwise participate in
the maintenance or operations of such premises, place or
facility, contrary to the provisions of N.J.S.A. 2C:35-4 and
N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT FOUR

(Manufacturing a Controlled Dangerous Substance - First Degree)

TUAN DANG

THU NGUYEN

and

NGOC BUI

between on or about September 1, 2008, and on or about February 18, 2010, at the Township of Monroe, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did manufacture a controlled dangerous substance, that is, marijuana, in a quantity of fifty or more marijuana plants, that is, approximately one thousand sixty-four marijuana plants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(10)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

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

TUAN DANG

THU NGUYEN

and

NGOC BUI

between on or about September 1, 2008, and on or about February 18, 2010, at the Township of Monroe, in the County of Middlesex, 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 twenty-five pounds or more including any adulterants or dilutants, that is, approximately fifty pounds of processed marijuana, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(10)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft of Services - Third Degree)

TUAN DANG

THU NGUYEN

and

NGOC BUI

between on or about September 1, 2008, and on or about February 18, 2010, at the Township of Monroe, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did commit the crime of theft of services, in that said TUAN DANG, THU NGUYEN and NGOC BUI purposely did obtain services, that is, electricity service, having a value in excess of \$500.00, which the said TUAN DANG, THU NGUYEN, and NGOC BUI knew to be available only for compensation, by deception or other means, that is, by obtaining electricity by bypassing the service provider's electric meter to 558 Spotswood-Englishtown Road, Monroe Township, New Jersey, to avoid payment for service, contrary to the provisions of N.J.S.A. 2C:20-8a, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Criminal Mischief - Third Degree)

TUAN DANG

THU NGUYEN

and

NGOC BUI

between on or about September 1, 2008, and on or about February 18, 2010, at the Township of Monroe, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely or recklessly did tamper with the tangible property of another, that is, real property located at 558 Spotswood-Englishtown Road, Monroe Township, New Jersey, owned by J.L. and W.K., so as to endanger the property of J.L. and W.K., causing a pecuniary loss of \$2,000.00 or more, contrary to the provisions of N.J.S.A. 2C:17-3a(2), N.J.S.A. 2C:17-3b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Maintaining or Operating a Controlled Dangerous
Substance Production Facility - First Degree)

TUAN DANG

and

NGOC BUI

between on or about January 1, 2009, and on or about February 18, 2010, at the Township of Old Bridge, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly did maintain or operate, a premises, place or facility, that is, a residence located at 47 Wesley Road, Old Bridge, New Jersey, used for the manufacture of marijuana in an amount greater than five pounds or ten plants, or knowingly did aid, promote, finance, or otherwise participate in the maintenance or operations of such premises, place or facility, contrary to the provisions of N.J.S.A. 2C:35-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Manufacturing a Controlled Dangerous Substance - First Degree)

TUAN DANG

and

NGOC BUI

between on or about January 1, 2009, and on or about February 18, 2010, at the Township of Old Bridge, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did manufacture a controlled dangerous substance, that is, marijuana, in a quantity of fifty or more marijuana plants, that is, six hundred and forty marijuana plants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(10)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

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

TUAN DANG

and

NGOC BUI

on or about February 18, 2010, at the Township of Millstone, in the County of Monmouth, at the Township of Old Bridge, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance in a quantity of five pounds or more including any adulterants or dilutants, that is, approximately fifteen pounds of marijuana found in a 2007 Toyota Sienna, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(10)(b), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Criminal Mischief - Third Degree)

TUAN DANG

and

NGOC BUI

between on or about January 1, 2009, and on or about February 18, 2010, at the Township of Old Bridge, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely or recklessly did tamper with the tangible property of another, that is, real property located at 47 Wesley Road, Old Bridge, New Jersey, owned by H.H., so as to endanger the property of H.H., causing a pecuniary loss of \$2,000.00 or more, contrary to the provisions of N.J.S.A. 2C:17-3a(2), N.J.S.A. 2C:17-3b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Maintaining or Operating a Controlled Dangerous
Substance Production Facility - First Degree)

TUAN DANG

and

NGOC BUI

between on or about July 25, 2008, and on or about February 18, 2010, at the Township of Millstone, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly did maintain or operate a premises, place or facility, that is, a residence located at 38 South Robbins Road, Millstone, New Jersey, used for the manufacture of marijuana in an amount greater than five pounds or ten plants, or knowingly did aid, promote, finance, or otherwise participate in the maintenance or operations of such premises, place or facility, contrary to the provisions of N.J.S.A. 2C:35-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Manufacturing a Controlled Dangerous Substance - First Degree)

TUAN DANG

and

NGOC BUI

between on or about July 25, 2008, and on or about February 18, 2010, at the Township of Millstone, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did manufacture a controlled dangerous substance, that is, marijuana, in a quantity of fifty or more marijuana plants, that is, five hundred and four marijuana plants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(10) (a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

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

TUAN DANG

and

NGOC BUI

on or about February 18, 2010, at the Township of Millstone, in the County of Monmouth, 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 twenty-five pounds or more including any adulterants or dilutants, that is, approximately fifty pounds of processed marijuana, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(10)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Theft of Services - Third Degree)

TUAN DANG

and

NGOC BUI

between on or about July 25, 2008, and on or about February 18, 2010, at the Township of Millstone, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, did commit the crime of theft of services, in that said TUAN DANG and NGOC BUI purposely did obtain services, that is, electricity service, having a value in excess of \$500.00, which the said TUAN DANG and NGOC BUI knew to be available only for compensation, by deception or other means, that is, by obtaining electricity by bypassing the service provider's electric meter to 38 South Robbins Road, Millstone, New Jersey, to avoid payment for service, contrary to the provisions of N.J.S.A. 2C:20-8a, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Criminal Mischief - Third Degree)

TUAN DANG

and

NGOC BUI

between on or about July 25, 2008, and on or about February 18, 2010, at the Township of Millstone, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, purposely or recklessly did tamper with the tangible property of another, that is, real property located at 38 South Robbins Road, Millstone, New Jersey, owned by T.W. and S.W., so as to endanger the property of T.W. and S.W., causing a pecuniary loss of \$2,000.00 or more, contrary to the provisions of N.J.S.A. 2C:17-3a(2), N.J.S.A. 2C:17-3b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Maintaining or Operating a Controlled Dangerous
Substance Production Facility - First Degree)

TUAN DANG

between on or about July 1, 2009, and on or about February 18, 2010, at the Township of Stafford, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did maintain or operate, a premise, place or facility, that is, a residence located at 535 Beach Avenue, Manahawkin, New Jersey, used for the manufacture of marijuana in an amount greater than five pounds or ten plants, or knowingly did aid, promote, finance, or otherwise participate in the maintenance or operations of such premises, place or facility, contrary to the provisions of N.J.S.A. 2C:35-4, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Manufacturing a Controlled Dangerous Substance - First Degree)

TUAN DANG

between on or about July 1, 2009, and on or about February 18, 2010, at the Township of Stafford, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did manufacture a controlled dangerous substance, that is, marijuana, in a quantity of fifty or more marijuana plants, that is, four hundred and sixty four marijuana plants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(10) (a), and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

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

TUAN DANG

between on or about July 1, 2009, and on or about February 18, 2010, at the Township of Stafford, in the County of Ocean, 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(10)(b), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Theft of Services - Third Degree)

TUAN DANG

between on or about July 1, 2009, and on or about February 18, 2010, at the Township of Stafford, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, did commit the crime of theft of services, in that said TUAN DANG purposely did obtain services, that is, electricity service, having a value in excess of \$500.00, which the said TUAN DANG knew to be available only for compensation, by deception or other means, that is, by obtaining electricity by bypassing the service provider's electric meter to 535 Beach Avenue, Manahawkin, New Jersey, to avoid payment for service, contrary to the provisions of N.J.S.A. 2C:20-8a and N.J.S.A. 2C:20-2b(2)(a), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Criminal Mischief - Third Degree)

TUAN DANG

between on or about July 1, 2009, and on or about February 18, 2010, at the Township of Stafford, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, purposely or recklessly did tamper with the tangible property of another, that is, real property located at 535 Beach Avenue, Manahawkin, New Jersey, owned by D.B. and K.B., so as to endanger the property of D.B. and K.B., causing a pecuniary loss of \$2,000.00 or more, contrary to the provisions of N.J.S.A. 2C:17-3a(2) and N.J.S.A. 2C:17-3b(1), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Money Laundering - Second Degree)

TUAN DANG

NGOC BUI

and

THU NUGYEN

between on or about January 1, 2007, and February 18, 2010, at the Township of Stafford, in the County of Ocean, at the Townships of Millstone, Manalapan, and Middletown, all in the County of Monmouth, at the Townships of Monroe and Old Bridge, both in the County of Middlesex, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, did transport or possess property known or which a reasonable person would believe to be derived from criminal activity, or did engage in transactions involving property known or which a reasonable person would believe to be derived from criminal activity with the intent to facilitate or promote the criminal activity, in an amount greater than \$75,000 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b, N.J.S.A. 2C:21-27a, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Bribery in Official Matters - Second Degree)

TUAN DANG

on or about February 18, 2010, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer or agree to confer a benefit as consideration for a violation of an official duty of a public servant, that is, the said TUAN DANG did offer between \$100,000 and \$150,000 in U.S. currency to Detective Christopher Wright, of the New Jersey State Police, in exchange for his release and the release of NGOC BUI, both of whom were under arrest and in the lawful custody of the New Jersey State Police, contrary to the provisions of N.J.S.A. 2C:27-2(c), and against the peace of this State, the government and dignity of the same.


AAG Stephen J. Taylor
Director
Division of Criminal Justice

A TRUE BILL:


Foreperson

Date: Nov-10-10

FILED

NOV 10 2010

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

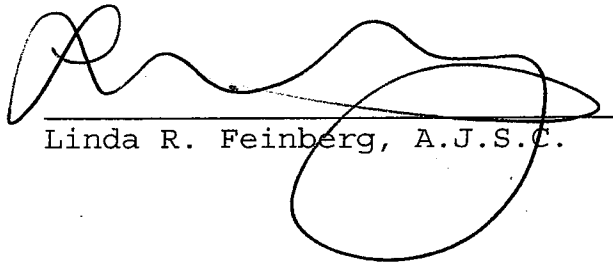
State Grand Jury
Number SGJ598-10-1(1)
Superior Court
Docket Number 10-11-00158-S

STATE OF NEW JERSEY)	
)	ORDER OF VENUE
v.)	
TUAN DANG,)	
AKA "LEE TRAN,")	
AKA "TRAN LEE,")	
AKA "LEE VU")	
)	
NGOC BUI,)	
AKA "HANG BUI")	
)	
THU NUGYEN)	

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

IT IS ORDERED on this ^{10th}~~9th~~ day of ^{November} 2010, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Ocean 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 Ocean for filing.


Linda R. Feinberg, A.J.S.C.

FILED

NOV 10 2010

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ598-10-1(2)

Superior Court

Docket Number 10-11-00159-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

TIN PHAM)

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

COUNT ONE

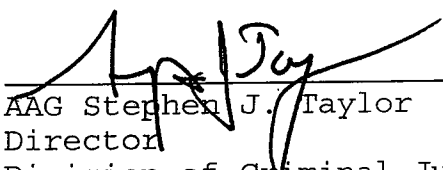
(Theft By Deception - Second Degree)

TIN PHAM

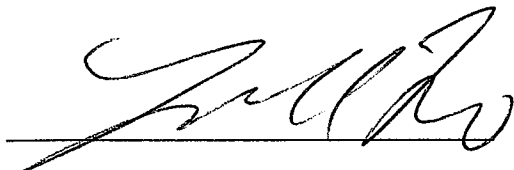
on or about March 9, 2007, at the Township of Barnegat, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, purposely did obtain the property of the Atlantic Home Loans, Inc., having a value of approximately \$370,000, by deception, that is, by creating or reinforcing the false impression through the execution of various application documents in connection with Atlantic Home Loans, Inc., mortgage loans 1070125013 and 1070125047, attesting that the said TIN PHAM had specific employment with M Nail Salon, and had lawful income of \$7,800.00 per month in support of said mortgage loan,

WHEREAS, IN TRUTH AND IN FACT, as the said TIN PHAM well knew, he did not receive the stated income identified in the documents he executed in support of the Atlantic Home Loans, Inc.

stated income identified in the documents he executed in support of Atlantic Home Loans, Inc. mortgage loans 1070125013 and 1070125047, contrary to the provisions of N.J.S.A. 2C:20-4, and N.J.S.A. 2C:20-2b(1)(a), and against the peace of this State, the government and dignity of the same.


AAG Stephen J. Taylor
Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: NOV-10-10

FILED

NOV 10 2010

**SUPERIOR COURT
CLERK'S OFFICE**


SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ598-10-1(2)
Superior Court
Docket Number 10-11-00159-S

STATE OF NEW JERSEY)
) ORDER OF VENUE
) v.
TIN PHAM)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,
IT IS ORDERED on this ^{10th} day of ^{November}, 2010, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Ocean 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 Ocean for filing.


Linda R. Feinberg, A.J.S.C.
