

**FILED**

**NOV 03 2011**

**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ609-11-13  
Superior Court  
Docket Number 11-11-00139-S

STATE OF NEW JERSEY )  
v. )  
KYLE OGLETREE )  
also known as "WHOP" )  
JAMARVIS GREEN )  
VICTOR MATIAS )  
DONTE COOK )  
LOVELL VENABLE )  
DAMIR LEA )  
also known as "D MONEY" )  
KEENAN OGLETREE )  
CARLTON RILEY, JR. )  
also known as "FAT BOY" )  
YUSEF ALLEN )  
LEON HOLMES )  
CALVIN JOHNSON )  
KEVIN OWENS )  
JONATHAN WOODS )  
and )  
MICHAEL WOODS )

INDICTMENT

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

COUNT ONE

(Racketeering - First Degree)

KYLE OGLETREE

JAMARVIS GREEN

VICTOR MATIAS

DONTE COOK

LOVELL VENABLE

DAMIR LEA

KEENAN OGLETREE

CARLTON RILEY

YUSEF ALLEN

LEON HOLMES

CALVIN JOHNSON

KEVIN OWENS

JONATHAN WOODS

and

MICHAEL WOODS

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and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members of the criminal enterprise, 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 activities which affected trade or commerce in the State of New Jersey, in that

they:

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 including the commission of crimes of the first degree, 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 or 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 the New Jersey Division of Criminal Justice, and with persons who were members of the New Jersey Division of Criminal Justice and other law enforcement agencies and were acting in an undercover capacity, 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, including the commission of crimes of the first degree, 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 May 1, 2010 and March 7, 2011, at the City of Camden, at the Township of Pennsauken, at the Township of Cherry Hill, in the County of Camden, at the Township of Deptford, in the County of Gloucester, at the City of Philadelphia, in the County of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court.

The Enterprise

KYLE OGLETREE, JAMARVIS GREEN, VICTOR MATIAS, DONTE COOK, LOVELL VENABLE, DAMIR LEE, KEENAN OGLETREE, CARLTON RILEY, YUSEF ALLEN, LEON HOLMES, CALVIN JOHNSON, KEVIN OWENS, JONATHAN WOODS and MICHAEL WOODS, and other persons whose identities are known and unknown to the State and are members and/or associates of this enterprise although not charged herein, did constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact or associates thereof for the purpose set forth below.

The Purposes of the Enterprise

The purposes of the enterprise would include the unlawful distribution of controlled dangerous substances in exchange for United States currency to perpetuate the enterprise accomplished as follows: The enterprise had a leadership which supervised and managed subordinate members in a common course of conduct to distribute and transport within and without this State, controlled dangerous substances including but not limited to

cocaine, heroin and Phencyclidine (PCP). The enterprise consisted of supervisors and/or managers who obtained the controlled dangerous substances from their suppliers who in turn obtained the controlled dangerous substances from their source(s). The supervisors and/or managers then coordinated the distribution of the controlled dangerous substances to street level distributors (trappers) who worked pre-set hours which were determined by management. Upon selling the controlled dangerous substances on behalf of the enterprise, the street level distributors kept a portion of the proceeds and provided the remaining profits to the upper level supervisors and/or managers. The supervisors also coordinated the distribution of controlled dangerous substances to "wholesale" clients who purchased larger quantities than that which was typically purchased from the street level distributors.

#### The Pattern of Racketeering Activity

The pattern of racketeering activity, as defined in N.J.S.A.

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2C:41-1d, consisted of at least two incidents of racketeering conduct by the enterprise including but not limited to: Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5 et. seq.); Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5 et. seq.) Distribution of a Controlled Dangerous Substances On or Near School Property (N.J.S.A. 2C:35-7), Distribution of a Controlled

Dangerous Substance within 500 feet of Certain Public Property (N.J.S.A. 2C:35-7.1); Financial Facilitation of Criminal Activity (Money Laundering) (N.J.S.A. 2C:21-25) and Conspiracy to commit the foregoing crimes (N.J.S.A. 2C:5-2) as described herein in.

Kyle Ogletree

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy, Possession with Intent to Distribute a Controlled Dangerous Substance, Unlawful Distribution of a Controlled Dangerous Substance, Possession of a Firearm during the Commission of Certain Crimes, Financial Facilitation of Criminal Activity (Money Laundering), all of which is the subject of Counts Two, Three, Four, Five, Ten, Twenty-Two, Twenty-Three, Twenty-Four and Twenty-Seven of this indictment.

Jamarvis Green

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy and Unlawful Distribution of a Controlled Dangerous Substance, all of which is the subject of Counts Two, Seven and Eight of this indictment.

Victor Matias

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy and Unlawful Distribution of a Controlled Dangerous Substance, all of which is the subject of Counts Two and Six of this indictment.

Donte Cook

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance, all of which is the subject of Counts Two, Twenty-Five and Twenty-Six of this indictment.

Lovell Venable

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance, all of which is the subject of Counts Two and Twenty-Three of this indictment.

Damir Lea

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance, all of which is the subject of Counts Two, Eight, Nine, and Twenty-Eight of this indictment.

Keenan Ogletree

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance, all of which is the subject of Counts Two and Ten of this indictment.

Carlton Riley

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance and Distribution of a Controlled Dangerous

Substance within 1,000 feet of School Property, all of which is the subject of Counts Two, Fourteen and Fifteen of this indictment.

Yusef Allen

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance, all of which is the subject of Counts Two and Thirteen of this indictment.

Leon Holmes

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance and Possession with Intent to Distribute a Controlled Dangerous Substance, all of which is the subject of Counts Two, Eleven and Twelve of this indictment.

Calvin Johnson

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance, all of which is the subject of Counts Two and Nine of this indictment.

Kevin Owens

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance, all of which is the subject of Counts Two and Nine of this indictment.



Jonathan Woods

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance, Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property and Distribution of a Controlled Dangerous Substance within 500 feet of Certain Public Property, all of which is the subject of Counts Two, Sixteen, Seventeen, Eighteen, Nineteen, Twenty and Twenty-One of this indictment.

Michael Woods

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Unlawful Distribution of a Controlled Dangerous Substance, and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property and Distribution of a Controlled Dangerous Substance within 500 feet of Certain Public Property, all of which is the subject of Counts Two, Sixteen, Seventeen and Eighteen of this indictment.

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

COUNT TWO

(Conspiracy - Second Degree)

KYLE OGLETREE

JAMARVIS GREEN

VICTOR MATIAS

DONTE COOK

LOVELL VENABLE

DAMIR LEA

KEENAN OGLETREE

CARLTON RILEY

YUSEF ALLEN

LEON HOLMES

CALVIN JOHNSON

KEVIN OWENS

JONATHAN WOODS

and

MICHAEL WOODS

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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, between on or about May 1, 2010, and on or about March 7, 2011, at the City of Camden, at the Township of Pennsauken, at the Township of Cherry Hill, in the County of Camden, in the City of Philadelphia, at the County of Philadelphia, in the Commonwealth of Pennsylvania, 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, distribution of a controlled dangerous substance within 500 feet of Certain Public Property and distribution of a controlled dangerous substance within 1,000 feet of School Property, did agree together and with members of law enforcement working in an undercover capacity and persons known to the Grand Jurors who were acting at the direction of law enforcement 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. Knowingly or purposely to distribute a controlled dangerous substance, that is, Phencyclidine (PCP), in a quantity of ten (10) grams 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(6) and N.J.S.A. 2C:35-5c; and

2. Knowingly or purposely to distribute a controlled dangerous substance, that is, Cocaine, in a quantity of five (5) 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

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), N.J.S.A. 2C:35-5b(2) and N.J.S.A. 2C:35-5c; and

4. Knowingly or purposely to 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

5. Knowingly or purposely to distribute a controlled dangerous substance, that is, Cocaine, within 500 feet of Certain Public Property, contrary to the provisions of N.J.S.A. 2C:35-7.1; and

6. Knowingly or purposely to distribute a controlled dangerous substance, that is, Cocaine, within 1,000 feet of School Property, contrary to the provisions of N.J.S.A. 2C:35-5 and N.J.S.A. 2C:35-7; and

7. 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), N.J.S.A. 2C:35-5b(2) and N.J.S.A. 2C:35-5c; and

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8. 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

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

(Distribution of a Controlled Dangerous  
Substance - First Degree)

KYLE OGLETREE

between on or about May 17, 2010, and on or about January 6,  
2011, 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 a quantity of five (5) 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), N.J.S.A. 2C:35-5c and N.J.S.A.  
2C:2-6 and, and against the peace of this State, the government  
and dignity of the same.

COUNT FOUR

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

KYLE OGLETREE

on or about January 7, 2011, at the Township of Cherry Hill, 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, Cocaine, in a quantity of five (5) 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 FIVE

(Possession of Firearm During the Commission  
of Certain Crimes - Second Degree)

KYLE OGLETREE

on or about January 7, 2011, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a loaded Taurus Millennium PT 140, .40 caliber handgun, serial #SVG1495, while in the course of committing a violation of N.J.S.A 2C:35-5, contrary to the provisions of N.J.S.A 2C:39-4.1a, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Distribution of a Controlled Dangerous  
Substance - First Degree)

VICTOR MATIAS

between on or about September 1, 2010, and December 7, 2010, at the City of Camden, at the City of Pennsauken, 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 a quantity of five (5) 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), N.J.S.A. 2C:35-5c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT SEVEN

(Distribution of a Controlled Dangerous  
Substance - Second Degree)

JAMARVIS GREEN

between on or about August 19, 2010, and October 25, 2010, 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 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), N.J.S.A. 2C:35-5c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Distribution of a Controlled Dangerous  
Substance - Third Degree)

JAMARVIS GREEN

and

DAMIR LEA

between on or about October 26, 2010, and October 28, 2010, 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), N.J.S.A.  
2C:35-5b(3), N.J.S.A. 2C:35-5c and N.J.S.A. 2C:2-6, and against  
the peace of this State, the government and dignity of the same.

COUNT NINE

(Distribution of a Controlled Dangerous  
Substance - Third Degree)

DAMIR LEA

CALVIN JOHNSON

and

KEVIN OWENS

on or about November 23, 2010, 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), 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 TEN

(Distribution of a Controlled Dangerous  
Substance - Third Degree)

KYLE OGLETREE

and

KEENAN OGLETREE

on or about October 20, 2010, 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), 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 ELEVEN

(Distribution of a Controlled Dangerous  
Substance - Third Degree)

LEON HOLMES

between on or about November 23, 2010, and December 30, 2010, 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), N.J.S.A. 2C:35-5b(3), N.J.S.A. 2C:35-5c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

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

LEON HOLMES

on or about February 23, 2011, 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, 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 THIRTEEN

(Distribution of a Controlled Dangerous  
Substance - Third Degree)

YUSEF ALLEN

on or about November 29, 2010, 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), 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 FOURTEEN

(Distribution of a Controlled Dangerous  
Substance - Third Degree)

CARLTON RILEY

between on or about November 15, 2010, and December 2, 2010, 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), N.J.S.A.  
2C:35-5b(3), N.J.S.A. 2C:35-5c and N.J.S.A. 2C:2-6, and against  
the peace of this State, the government and dignity of the same.



COUNT FIFTEEN

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

CARLTON RILEY

between on or about November 15, 2010, and December 2, 2010, 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:35-5, while within 1,000 feet of Sacred Heart School, which is an elementary school or secondary school 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.

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COUNT SIXTEEN

(Distribution of a Controlled Dangerous  
Substance - Third Degree)

JONATHAN WOODS

and

MICHAEL WOODS

on or about November 9, 2010, 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), 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 SEVENTEEN

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

JONATHAN WOODS

and

MICHAEL WOODS

on or about November 9, 2010, 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:35-5, while within 1,000 feet of School Property, which is owned or leased to any elementary school, secondary school or school board and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Distribution of a Controlled Dangerous Substance within  
500 Feet of Certain Public Property - Second Degree)

JONATHAN WOODS

and

MICHAEL WOODS

on or about November 9, 2010, 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:35-5,  
while within 500 feet of certain public property, that is, South  
Camden Park, 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 NINETEEN

(Distribution of a Controlled Dangerous  
Substance - Third Degree)

JONATHAN WOODS

on or about November 16, 2010, 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), 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 TWENTY

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

JONATHAN WOODS.

on or about November 16, 2010, 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:35-5, while within 1,000 feet of Creative Arts High School, which is an elementary school or secondary school 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-ONE

(Distribution of a Controlled Dangerous Substance within  
500 Feet of Certain Public Property - Second Degree)

JONATHAN WOODS

on or about November 16, 2010, 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:35-5, while within 500 feet of certain public property, that is, South Camden Park, 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-TWO

(Distribution of a Controlled Dangerous  
Substance - First Degree)

KYLE OGLETREE

between on or about May 23, 2010, and September 28, 2010, 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, Phencyclidine (PCP), in a quantity of ten (10) grams 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(6), N.J.S.A. 2C:35-5c 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

(Distribution of a Controlled Dangerous  
Substance - First Degree)

KYLE OGLETREE

and

LOVELL VENABLE

between on or about September 22, 2010, and November 24, 2010, 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, Phencyclidine (PCP), in a quantity of ten (10) grams 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(6), N.J.S.A. 2C:35-5c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Distribution of a Controlled Dangerous  
Substance - Second Degree)

KYLE OGLETREE

between on or about August 1, 2010, and October 12, 2010, 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, 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), N.J.S.A. 2C:35-5c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Distribution of a Controlled Dangerous  
Substance - Third Degree)

DONTE COOK

on or about October 12, 2010, 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:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Distribution of a Controlled Dangerous  
Substance - Second Degree)

DONTE COOK

on or about November 29, 2010, and November 30, 2010, 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(2), N.J.S.A. 2C:35-5c and N.J.S.A. 2C:2-6, against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Money Laundering - Third Degree)

KYLE OGLETREE

between on or about May 1, 2010, and March 7, 2011, at the City of Camden, in the County of Camden, at the Township of Deptford, in the County of Gloucester, elsewhere and within the jurisdiction of this Court, did commit the offense of money laundering, in that KYLE OGLETREE, did engage in transactions involving property known to be derived from criminal activity, including racketeering and distribution of a controlled dangerous substance with the intent to facilitate or promote the said criminal activity, that is, KYLE OGLETREE, utilized proceeds of the sales of controlled dangerous substances to rent vehicles to engage in the aforementioned crimes, and did transport or possess property known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b(1), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Witness Tampering - First Degree)

DAMIR LEA

on or about July 30, 2011, at the City of Camden, in the County of Camden, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, knowingly did attempt to induce or otherwise cause TE, to testify or inform falsely or to withhold testimony or elude legal process or absent himself from any proceedings or investigation to which he has been legally summoned or otherwise obstruct, delay, prevent or impede an official proceeding or investigation involving a crime enumerated in N.J.S.A. 2C:43-7.2d, that is, First Degree Racketeering, N.J.S.A. 2C:41-2c, by the employment of force, contrary to the provisions of N.J.S.A. 2C:28-5a, and against the peace of this State the government and dignity of the same.

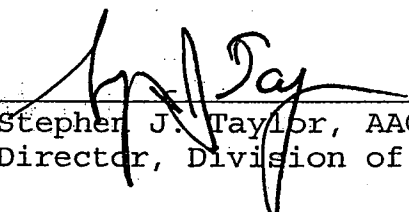
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COUNT TWENTY-NINE

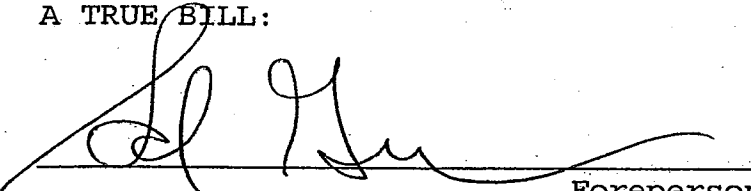
(Possession of a Weapon by Certain Persons - Second Degree)

KYLE OGLETREE

on or about January 7, 2011, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of distribution of a controlled dangerous substance, Camden County Indictment Number 03-08-03040I, on October 24, 2003, did possess or control a weapon, that is, a loaded Taurus Millennium PT 140, .40 caliber handgun, serial #SVG1495, 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.

  
\_\_\_\_\_  
Stephen J. Taylor, AAG  
Director, Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
, Foreperson

Dated: 11-3-11

**FILED**

NOV 03 2011

**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ609-11-13

Superior Court

Docket Number 11-11-00139-S

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

KYLE OGLETREE )  
also known as )  
"WHOP" )

JAMARVIS GREEN )

VICTOR MATIAS )

DONTE COOK )

LOVELL VENABLE )

DAMIR LEA )  
also known as )  
"D MONEY" )

KEENAN OGLETREE )

CARLTON RILEY, JR. )  
also known as )  
"FAT BOY" )

YUSEF ALLEN )

LEON HOLMES )

CALVIN JOHNSON )

KEVIN OWENS )

JONATHAN WOODS )

and )

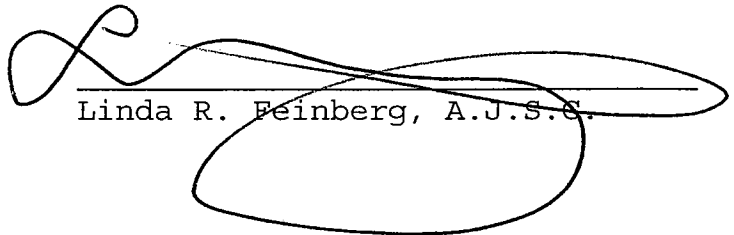
MICHAEL WOODS )



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

IT IS ORDERED on this *3rd* day of *November*, 2011, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Camden 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 Camden for filing.

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