

FILED

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SUPERIOR COURT  
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ604-11-1

Superior Court

Docket Number 11-05-00043-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

DEMPSEY COLLINS )

DAVID GILLIENS )

ASHMIRE JONES )

VANQUAN RUSH )

RASHEEN RICE )

THOMAS JOHNSON )

KWADIR FELTON )

NARRELL LYTCH )

RASHEED BONEY )

JERMAINE MITCHELL )

KANISHA MALLARD )

KIM JONES )

and )

DELILAH COLLINS )

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

COUNT ONE

(Leader of Narcotics Trafficking Network - First Degree)

DEMPSEY COLLINS

and

DAVID GILLIENS

between in or about August 2009, and on or about February 18, 2010, at the City of Jersey City, in the County of Hudson, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as organizers, supervisors, financiers, or managers, to engage for profit in a scheme or course of conduct to unlawfully manufacture, distribute, dispense, bring into or transport in this State heroin, marijuana, and phencyclidine (PCP), contrary to the provisions of N.J.S.A. 2C:35-3, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Conspiracy - Second Degree)

DEMPSEY COLLINS

DAVID GILLIENS

ASHMIRE JONES

VANQUAN RUSH

RASHEEN RICE

THOMAS JOHNSON

KWADIR FELTON

NARRELL LYTCH

RASHEED BONEY

JERMAINE MITCHELL

KANISHA MALLARD

KIM JONES

and

DELILAH COLLINS

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants in this Indictment, including an undercover New Jersey State Police Detective, a cooperating witness, who at all times relative to the Indictment was acting as an agent of the New Jersey State Police, and two juveniles, D.H. and M.H., between in or about August 2009, and on or about August 31, 2010, at the City of Jersey City, in the County of Hudson, at the City of East Orange, in the County of Essex, elsewhere, and within the

jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of distribution of a controlled dangerous substance, possession with intent to distribute a controlled dangerous substance, and money laundering, 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 the said crimes, that is:

1. Knowingly or purposely distribute or possess with intent to distribute a controlled dangerous substance, that is, phencyclidine (PCP), in a quantity of ten 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), and N.J.S.A. 2C:35-5c;

2. Knowingly or purposely distribute or possess with intent to distribute a controlled dangerous substance, that is, heroin, in a quantity of one-half ounce or more, but less than five ounces, 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:35-5b(3), and N.J.S.A. 2C:35-5c;

3. Knowingly or purposely distribute or possess with intent to distribute a controlled dangerous substance, that is, marijuana, in a quantity of one ounce or more, but less than five

pounds, 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(11), and N.J.S.A. 2C:35-5c;

4. Knowingly transport or possess property known or which a reasonable person would believe to be derived from criminal activity, or 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 or knowing the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of said property, or knowingly direct, organize, finance, plan, manage, supervise, or control the transportation of or the transactions in property known or which a reasonable person would believe to be derived from criminal activity, said property having an aggregate value less than \$75,000, contrary to the provisions of N.J.S.A. 2C:21-25.

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)

ASHMIRE JONES

on or about September 27, 2009, at the City of Jersey City, in the County of Hudson, 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 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), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Distribution Within 1,000 Feet of School Property-Third Degree)

ASHMIRE JONES

on or about September 27, 2009, at the City Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of P.S. #12, the Julia A. Barnes School, which is owned by or leased to the Jersey City 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 FIVE

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

ASHMIRE JONES

on or about September 27, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 500 feet of certain public property, that is, Cornelison Avenue 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 SIX

(Possession of a Controlled Dangerous Substance - Third Degree)

ASHMIRE JONES

on or about September 27, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, phencyclidine (PCP), a Schedule III controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Distribution of a Controlled Dangerous Substance - First Degree)

ASHMIRE JONES

and

DAVID GILLIENS

on or about October 11, 2009, at the City of Jersey City, in the County of Hudson, 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 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), 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 Within 1,000 Feet of School Property - Third Degree)

ASHMIRE JONES

and

DAVID GILLIENS

on or about October 11, 2009, at the City Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the Saint Patrick School, which is owned by or leased to the Archdiocese of Newark, 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 NINE

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

ASHMIRE JONES

and

DAVID GILLIENS

on or about October 11, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 500 feet of certain public property, that is, Izetta McDuffy Park, contrary to the provisions of N.J.S.A. 2C:35-7.1, 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 of a Controlled Dangerous Substance - Third Degree)

ASHMIRE JONES

and

DAVID GILLIENS

on or about October 11, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, phencyclidine (PCP), a Schedule III controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), 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 - First Degree)

DAVID GILLIENS

on or about November 8, 2009, at the City of Jersey City, in the County of Hudson, 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 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), 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 Within 1,000 Feet of School Property-Third Degree)

DAVID GILLIENS

on or about November 8, 2009, at the City Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the PS #15, the Whitney M. Young, Jr. School, which is owned by or leased to the Jersey City 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 THIRTEEN

(Possession of a Controlled  
Dangerous Substance - Third Degree)

DAVID GILLIENS

on or about November 8, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, phencyclidine (PCP), a Schedule III controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.



COUNT FOURTEEN

(Distribution of a Controlled Dangerous Substance - First Degree)

DAVID GILLIENS

on or about December 20, 2009, at the City of Jersey City, in the County of Hudson, 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 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), 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 Within 1,000 Feet of School Property-Third Degree)

DAVID GILLIENS

on or about December 20, 2009, at the City Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the PS #23, the Mahatma K. Gandhi School, which is owned by or leased to the Jersey City 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 SIXTEEN

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

DAVID GILLIENS

on or about December 20, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 500 feet of certain public property, that is, Van Wagenen Avenue Apartments, a public housing facility, 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 SEVENTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

DAVID GILLIENS

on or about December 20, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, phencyclidine (PCP), a Schedule III controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Distribution of a Controlled Dangerous Substance - First Degree)

DAVID GILLIENS

on or about December 26, 2009, at the City of Jersey City, in the County of Hudson, 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 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), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

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

DAVID GILLIENS

on or about December 26, 2009, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute, a controlled dangerous substance, that is, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the McNair Academic High School, which is owned by or leased to the Jersey City 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

(Possession of a Controlled Dangerous Substance - Third Degree)

DAVID GILLIENS

on or about December 26, 2009, at the City of Jersey City, in the County of Hudson, elsewhere and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, phencyclidine (PCP), a Schedule III controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Distribution of a Controlled Dangerous Substance - First Degree)

DEMPSEY COLLINS

DAVID GILLIENS

and

THOMAS JOHNSON

and another, whose identity is known to the Grand Jurors but not named as a defendant in this Indictment, on or about December 28, 2009, at the City of Jersey City, in the County of Hudson, 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 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), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT TWENTY-TWO

(Distribution Within 1,000 Feet of School Property-Third Degree)

DEMPSEY COLLINS

DAVID GILLIENS

and

THOMAS JOHNSON

and another, whose identity is known to the Grand Jurors but is not named as a defendant in this Indictment, on or about December 28, 2009, at the City Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of McNair Academic High School, which is owned by or leased to Jersey City Board of Education, 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 TWENTY-THREE

(Possession of a Controlled  
Dangerous Substance - Third Degree)

DEMPSEY COLLINS

DAVID GILLIENS

and

THOMAS JOHNSON

and another, whose identity is known to the Grand Jurors but who is not named as a defendant in this Indictment, on or about December 28, 2009, at the City of Jersey City, in the County of Hudson, elsewhere and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, phencyclidine (PCP), a Schedule III controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), 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 - First Degree)

DAVID GILLIENS

on or about January 2, 2010, at the City of Jersey City, in the County of Hudson, 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 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), 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

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

NARRELL LYTCH

on or about January 2, 2010, at the City of Jersey City, in the County of Hudson, at the City of East Orange, 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, phencyclidine (PCP), in a quantity of 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), 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

(Possession With Intent To Distribute a Controlled Dangerous Substance Within 1,000 Feet of School Property-Third Degree)

NARRELL LYTCH

on or about January 2, 2010, at the City of East Orange, 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, phencyclidine (PCP), in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the Langston Hughes Elementary School, which is owned by or leased to the City of East Orange School District, 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-SEVEN

(Money Laundering - Third Degree)

NARRELL LYTCH

on or about January 2, 2010, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did commit the crime of money laundering, in that the said NARRELL LYTCH did transport or possess property or did engage in transactions involving property known, or which a reasonable person would believe, to be derived from criminal activity, in an amount of at least \$500.00 but less than \$75,000, that is, the said NARRELL LYTCH, did have in his possession property, that is, approximately \$7,042 in United States currency, known to be or that which a reasonable person would believe to be, derived from the distribution of controlled dangerous substances, contrary to the provisions of N.J.S.A. 2C:21-25, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

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

DEMPSEY COLLINS

and

DAVID GILLIENS

being at least 18 years of age, between on or about December 9, 2009, and on or about January 12, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did use, solicit, direct, hire or employ persons 17 years of age or younger, including but not limited to, D.H. and M.H., 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 TWENTY-NINE

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

DEMPSEY COLLINS

and

DAVID GILLIENS

and others, whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants in this Indictment, including but not limited to M.H. and D.H., on or about January 12, 2010, at the City of Jersey City, in the County of Hudson, 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 more than one-half ounce, but less than five ounces, 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 THIRTY

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

DEMPSEY COLLINS

and

DAVID GILLIENS

and others, whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants in this Indictment, including but not limited to M.H. and D.H., on or about January 12, 2010, at the City Jersey City, in the County of Hudson, 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 violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of P.S. #38, the James F. Murray School, which is owned by or leased to the Jersey City Board of Education, 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 THIRTY-ONE

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

DEMPSEY COLLINS

and

DAVID GILLIENS

and others, whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants in this Indictment, including but not limited to M.H. and D.H., on or about January 12, 2010, at the City of Jersey City, in the County of Hudson, 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 violation of N.J.S.A. 2C:35-5a, while within 500 feet of certain public property, that is, Audobon Park, contrary to the provisions of N.J.S.A. 2C:35-7.1, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Money Laundering - Third Degree)

DEMPSEY COLLINS

DAVID GILLIENS

and

DELILAH COLLINS

between in or about August 2009, and on or about February 18, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the crime of money laundering, in that the said DEMPSEY COLLINS, DAVID GILLIENS, and DELILAH COLLINS, did transport or possess property or did engage in transactions involving property known, or which a reasonable person would believe, to be derived from criminal activity, or did direct, organize, finance, plan, manage, supervise, or control the transportation of or transactions in property known or which a reasonable person would believe to be derived from criminal activity, in an amount of less than \$75,000.00, that is, the said DEMPSEY COLLINS, DAVID GILLIENS, and DELILAH COLLINS, did have in their possession property, that is, approximately \$24,200 in United States currency, property known to be or that which a reasonable person would believe to be derived from the distribution of controlled dangerous substances, contrary to the provisions of N.J.S.A. 2C:21-25, and N.J.S.A. 2C:2-6, and against the peace of this

State, the government and dignity of the same.

COUNT THIRTY-THREE

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

RASHEED BONEY

and

KWADIR FELTON

on or about January 10, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did possess, receive, or transfer community guns while engaged in criminal activity, that is, the said RASHEED BONEY and KWADIR FELTON did possess a Hi-Point Model C9, 9 millimeter handgun, bearing serial number P1361216, and a Glock 23, .40 caliber handgun, bearing serial number KHL808, which were possessed, received, or transferred between RASHEED BONEY and KWADIR FELTON, while engaged in the distribution of controlled dangerous substances, contrary to the provisions of N.J.S.A. 2C:39-4a(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Unlawful Possession of a Weapon - Second Degree)

KWADIR FELTON

on or about January 10, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did possess a weapon, that is, a Hi-Point Model C9, 9 millimeter handgun, bearing serial number P1361216, without having first obtained a firearms purchaser identification card, as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT THIRTY-FIVE

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

KWADIR FELTON

on or about January 10, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm with the purpose to use it unlawfully against the person or property of another, that is, the said KWADIR FELTON did possess a Hi-Point Model C9, 9 millimeter handgun, bearing serial number P1361216, with the purpose to use it unlawfully against Sergeant Thomas McVicar, Jersey City Police Department, contrary to the provisions of N.J.S.A. 2C:39-4a(1), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Aggravated Assault - Fourth Degree)

KWADIR FELTON

on or about January 10, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly, under circumstances manifesting extreme indifference to the value of human life, pointed a firearm at another individual, that is the said KWADIR FELTON, knowingly pointed a loaded, Hi-Point Model C9, 9 millimeter handgun at Sergeant Thomas McVicar, Jersey City Police Department, under circumstances that manifested an extreme indifference to the value of a human life, contrary to the provisions of N.J.S.A. 2C:12-1b(4), and against the peace of this State, the government and dignity of the same.



COUNT THIRTY-SEVEN

(Unlawful Possession of a Weapon - Second Degree)

RASHEED BONEY

on or about January 10, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did possess a weapon, that is, a Glock 23, .40 caliber handgun, bearing serial number KHL808, without having first obtained a firearms purchaser identification card, as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT THIRTY-EIGHT

(Possession of a Controlled Dangerous Substance - Third Degree)

KANISHA MALLARD

on or about February 18, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Distribution of a Controlled Dangerous Substance - Third Degree)

DEMPSEY COLLINS

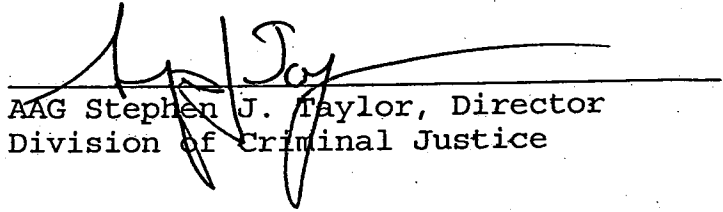
on or about August 31, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in an amount less than one-half ounce, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Possession of a Controlled Dangerous Substance - Third Degree)

DEMPSEY COLLINS

on or about August 31, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

  
AAG Stephen J. Taylor, Director  
Division of Criminal Justice

A TRUE BILL:



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, Foreperson

Dated: 5/19/11

FILED

MAY 19 2011

SUPERIOR COURT  
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ604-11-1

Superior Court

Docket Number

11-05-00043-5

STATE OF NEW JERSEY )  
 v. )  
 DEMPSEY COLLINS )  
 DAVID GILLIENS )  
 ASHMIRE JONES )  
 VANQUAN RUSH )  
 RASHEEN RICE )  
 THOMAS JOHNSON )  
 KWADIR FELTON )  
 NARRELL LYTCH )  
 RASHEED BONEY )  
 JERMAINE MITCHELL )  
 KANISHA MALLARD )  
 KIM JONES )  
 and )  
 DELILAH COLLINS )

ORDER OF VENUE

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

IT IS ORDERED on this *19th* day of *May*, 2011, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Hudson be and hereby is designated as the County of venue for the purpose of trial.