

SUPERIOR COURT OF N.J.
REC'D

AUG 24 2007

Madore J. Kelly
Acting Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 540-07-1(1)

Superior Court

Docket Number 07-08-00118-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

ANTONIO MERRITT)
also know as)
"CAPONE")

BOBBY WILLIAMS)

FELICITA GEE)
also known as)
"FEE")

ANTWON C. YEAGER)
also known as)
"PAPERBOY")
also known as)
"VERSE")

KHALFINI RICHARDSON)
also known as)
"KALF")

MICHAEL DAVIS)
also known as)
"BLADE")

BOBBY DAVIS, JR.)

JAMES EDENS)
also known as)
"BOOM")

OLIVER HARRIS)
also known as)
"DINK")

BAYSHAWN NELSON)
also known as)
"BANKS")

CAPITAL WELLONS)
also known as)
"TORRE")

SHAWN DAVIS)
also known as)
"LITTLE")

QUASSIM HALLET)
also known as)
"QUOS")

ANTOINE TAYLOR)

and)

MYCAL BOONE)

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

COUNT ONE

(Racketeering - First Degree)

- ANTONIO MERRITT
- BOBBY WILLIAMS
- FELICITA GEE
- ANTWON C. YEAGER
- KHALFINI RICHARDSON
- MICHAEL DAVIS
- BOBBY DAVIS, JR.
- JAMES EDENS
- OLIVER HARRIS
- BAYSHAWN NELSON

SHAWN DAVIS
CAPITAL WELLONS
QUASSIM HALLET
and
ANTOINE TAYLOR

and other persons whose identities are known and unknown to the Grand Jurors, who are members of the criminal enterprise and co-conspirators but not defendants herein, at the times and places herein specified, did commit the crime of racketeering, that is, the defendants and other persons employed by or associated with an 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 or collection of unlawful debt, including the commissions 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 occurred between in or about February 2005, and in or about February 2007, at the City of Trenton, in the County of Mercer, at Township of Woodbridge, in the County of Middlesex, at the Town of Hackensack, in the

County of Bergen, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

ANTHONY CARTER, ANTONIO MERRITT, BOBBY WILLIAMS, FELICITA GEE, ANTWON YEAGER, QUASSAN BETHEA, CALVIN LITTLE, KHALIFINI RICHARDSON, REGINALD JACKSON, MICHAEL DAVIS, RAYSHAWN MCNAIR, RONELL DIXON, BOBBY DAVIS, JR., JAMES EDENS, OLIVER HARRIS, BAYSHAWN NELSON, CAPITAL WELLONS, SHAWN DAVIS, QUASSIM HALLET, ANTOINE TAYLOR, and other persons whose identities are known and unknown to the Grand Jurors, who are all conspirators, 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 "Sex Money Murder" set of the Bloods street gang (hereinafter referred to as the Sex Money Murder set).

THE PURPOSES OF THE ENTERPRISE

The purpose of the enterprise was to distribute controlled dangerous substances to earn money for members of the Sex Money Murder street gang. The leadership of the enterprise organized and directed the subordinate members to distribute and transport both within and outside this State, controlled dangerous substances. The enterprise functioned through a structured chain of command. Its members had specific ranks and titles that defined their roles in the gangs hierarchy. There was a process of internal discipline including assaults and murders

inflicted on members who disobeyed the rules. The enterprise further used violence, including assaults and murders, in order to protect Sex Money Murder drug distribution areas and Sex Money Murder members and associates from rival gang members.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, engaged in by members of the enterprise, did consist of at least two incidents of racketeering conduct during the relevant time period stated above, including but not limited to Leader of Narcotics Trafficking Network (N.J.S.A. 2C:35-3), 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), Controlled Dangerous Substances Near or on School Property (N.J.S.A. 2C:35-7), Distributing, Dispensing or Possessing Controlled Dangerous Substances Within 500 Feet of Certain Public Property (N.J.S.A. 2C:35-7.1), Possessions of Weapons for Unlawful Purposes (N.J.S.A. 2C:39-4), Possession of Weapons During Commission of Certain Crimes (N.J.S.A. 2C:39-4.1), Attempted Murder (N.J.S.A. 2C:11-3), or conspiracies to commit these crimes, as described herein and in Counts Two through Twenty-Seven of this Indictment.

ANTONIO MERRIT

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Leader of Narcotics Trafficking Network, Distribution of a Controlled Dangerous Substance, and Possession with Intent to Distribute a Controlled Dangerous Substance, which racketeering conduct is the subject of Counts 2, 17, 18, and 19 of this Indictment.

BOBBY WILLIAMS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Leader of Narcotics Trafficking Network, Distribution of a Controlled Dangerous Substance, and Possession with Intent to Distribute a Controlled Dangerous Substance, which racketeering conduct is the subject of Counts 3, 6, 7, 8, 9, 10, 11, 12, 13, and 14 of this Indictment.

FELICITA GEE

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribute Controlled Dangerous Substances and Possession with Intent to Distribute a Controlled Dangerous Substance, which racketeering conduct is the subject of Counts 17 and 18 of this Indictment.

ANTWON YEAGER

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution of a Controlled Dangerous Substance, Possession with Intent to Distribute a Controlled

Dangerous Substance, and Possession of a Weapon During Commission of Certain Crimes, which racketeering conduct is the subject of Counts 26 and 27 of this Indictment.

KHALFINI RICHARDSON

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution of a Controlled Dangerous Substance which racketeering conduct is the subject of Count 6 of this Indictment.

MICHAEL DAVIS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes Distribution of a Controlled Dangerous Substance, which racketeering conduct is the subject of Counts 20, 21, and 22 of this Indictment.

BOBBY DAVIS, JR.

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution of a Controlled Dangerous Substance, Possession with Intent to Distribute a Controlled Dangerous Substance, and Conspiracy to Distribute Controlled Dangerous Substance which racketeering conduct is the subject of Counts 6, 8, and 9 of this Indictment.

JAMES EDENS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution of a Controlled Dangerous Substance and Possession with Intent to Distribute a Controlled

Dangerous Substance which racketeering conduct is the subject of Counts 23 of this Indictment.

OLIVER HARRIS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution of a Controlled Dangerous Substance and Possession with Intent to Distribute a Controlled Dangerous Substance, which racketeering conduct is the subject of Counts 17 and 18 of this Indictment.

BAYSHAWN NELSON

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy to Distribute Controlled Dangerous Substance and Distribution a Controlled Dangerous Substance, which racketeering conduct is the subject of Counts 6 and 13 of this Indictment.

SHAWN DAVIS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution of a Controlled Dangerous Substance which racketeering conduct is the subject of Counts 6 and 12 of this Indictment.

CAPITAL WELLONS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution of a Controlled Dangerous Substance and Possession with Intent to Distribute a Controlled Dangerous Substance, and Possession of a Weapon During

Commission of Certain Crimes, which racketeering conduct is the subject of Counts 14 and 15 of this Indictment.

QUASSIM HALLET

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Attempted Murder, and Possession of a Weapon for an Unlawful Purpose, which racketeering conduct is the subject of Counts 4 and 5 of this Indictment.

ANTOINE TAYLOR

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Distribution of a Controlled Dangerous Substance, which racketeering conduct is the subject of Count 25 of this Indictment.

All contrary to the provisions 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)

ANTONIO MERRITT

between on or about February 2, 2005, and on or about February 2, 2007, at the City of Trenton, in the County of Mercer, at the Township of Woodbridge, in the County of Middlesex, at the Town of Hackensack, in the County of Bergen, in the Commonwealth of Pennsylvania, 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 manufacture, distribute, dispense, bring into or transport in this State cocaine, a Schedule II controlled dangerous substance, and heroin, a Schedule I controlled dangerous substance, said crime being committed while the said ANTONIO MERRITT was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 THREE

(Leader of Narcotics Trafficking Network - First Degree)

BOBBY WILLIAMS

between on or about February 2, 2005, and on or about February 2, 2007, at the City of Trenton, in the County of Mercer, in the Commonwealth of Pennsylvania, 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 manufacture, distribute, dispense, bring into or transport in this State cocaine, a Schedule II controlled dangerous substances, said crime being committed while the said BOBBY WILLIAMS was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 FOUR

(Attempted Murder - First Degree)

QUASSIM HALLET

on or about November 25, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of Antonio Merritt, said crime being committed while the said QUASSIM HALLET was knowingly involved in criminal street gang activity defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3 and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

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

QUASSIM HALLET

on or about November 25, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain firearm, that is, an unknown make and model shot gun, with purpose to use it unlawfully against the person of another, to wit, Antonio Merritt, said crime being committed while the said QUASSIM HALLET was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 SIX

(Conspiracy - Second Degree)

BOBBY WILLIAMS

BAYSHAWN NELSON

KHALFINI RICHARDSON

SHAWN DAVIS

and

BOBBY DAVIS, JR.

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not defendants herein, between on or about April 19, 2006, and on or about January 10, 2007, at the City of Trenton, in the County of Mercer, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of distribution of 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 the said crimes, that is: 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:35-5(a)(1) and N.J.S.A. 2C:35-5(b)(2).

Said crime being committed while the said BOBBY WILLIAMS, BAYSHAWN NELSON, KHALFINI RICHARDSON, SHAWN DAVIS, and BOBBY DAVIS, JR. were knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h).

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 SEVEN

(Distribution of a Controlled
Dangerous Substance - First Degree)

BOBBY WILLIAMS

between on or about October 12, 2006 and on or about December 20, 2006 at the City of Trenton, in the County of Mercer, 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, that being approximately 2.82 ounces on October 12, 2006, and approximately 3.51 ounces on December 20, 2006, said crime being committed while the said BOBBY WILLIAMS was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 EIGHT

(Distribution of a Controlled
Dangerous Substance - Second Degree)

BOBBY WILLIAMS

and

BOBBY DAVIS, JR.

on or about April 19, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in the quantity of one-half ounce or more including any adulterants or dilutants, said crime being committed while the said BOBBY WILLIAMS and BOBBY DAVIS, JR. were knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 NINE

(Distribution of a Controlled Dangerous Substance on or within 1000 Feet of School Property - Third Degree)

BOBBY WILLIAMS

and

BOBBY DAVIS, JR.

on or about April 19, 2006, at the City of Trenton, in the County of Mercer, elsewhere, 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 1000 feet of Munoz Rivera School, which is owned by or leased to the Trenton Public Schools and used for school purposes, said crime being committed while the said BOBBY WILLIAMS and BOBBY DAVIS, JR. were knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 TEN

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

BOBBY WILLIAMS

on or about October 12, 2006, at the City of Trenton, in the County of Mercer, elsewhere, 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 500 feet of real property comprising a public housing facility, that is, the Roger Gardens Public Assisted Housing, located in the City of Trenton, which is owned by or leased to the City of Trenton and used for public housing purposes, said crime being committed while the said BOBBY WILLIAMS was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 ELEVEN

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

BOBBY WILLIAMS

on or about December 20, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, being at least 18 years of age, knowingly did use, solicit, direct, hire or employ a person 17 years of age or younger, that is, Q.G. whose identity is known to the Grand Jurors, to violate N.J.S.A. 2C:35-5a, said crime being committed while the said BOBBY WILLIAMS was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Distribution of a Controlled
Dangerous Substance - First Degree)

BOBBY WILLIAMS

and

SHAWN DAVIS

on or about December 28, 2006, at the City of Trenton, in the County of Mercer, 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 ounces or more including any adulterants or dilutants, said crime being committed while the said BOBBY WILLIAMS and SHAWN DAVIS were knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Distribution of a Controlled
Dangerous Substance - Second Degree)

BOBBY WILLIAMS

and

BAYSHAWN NELSON

on or about January 18, 2007, at the City of Trenton, in the County of Mercer, 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, said crime being committed while the said BOBBY WILLIAMS and BAYSHAWN NELSON were knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 FOURTEEN

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

CAPITAL WELLONS

and

BOBBY WILLIAMS

on or about February 1, 2007, at the City of Trenton, in the County of Mercer, 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 ounces or more including any adulterants or dilutants, said crime being committed while the said CAPITAL WELLONS and BOBBY WILLIAMS were knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(1), 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 of Weapons during Commission
of Certain Crimes - Second Degree)

CAPITAL WELLONS

on or about February 1, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is a Mac 10 firearm while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5a, said crime being committed while the said CAPITAL WELLONS was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-4.1(a) and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Sale of Simulated Documents - Third Degree)

ANTONIO MERRITT

and

BOBBY WILLIAMS

on or about September 3, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a document or other writing which falsely purported to be a driver's license or other document issued by a governmental agency and which could be used as a means of verifying a person's identity or age or any other personal identifying information, that is, the said ANTONIO MERRITT did, with the aid of BOBBY WILLIAMS, exhibit or display New Jersey Motor Vehicle Commission documents in the name of BOBBY WILLIAMS to a law enforcement officer upon being stopped for a motor vehicle infraction, which documents could be used as a means of verifying a person's identity or age or any other personal identifying information, contrary to the provisions of N.J.S.A. 2C:21-2.1c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Conspiracy - Second Degree)

ANTONIO MERRITT

FELICITA GEE

and

OLIVER HARRIS

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not defendants herein, on or about August 17, 2006, at the City of Trenton, in the County of Mercer, at the Township of Woodbridge, 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 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 the said crimes, that is:

1. Knowingly or purposely to distribute a controlled dangerous substance, that is, heroin, in a quantity of five ounces or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1) and N.J.S.A. 2C:35-5(b)(1), and

2. Knowingly or purposely to possess with intent to distribute a controlled dangerous substance, that is, heroin, in a quantity of five ounces or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a) (1) and N.J.S.A. 2C:35-5(b) (1), and

Said crimes being committed while the said ANTONIO MERRITT, FELICITA GEE and OLIVER HARRIS were knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h) .

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

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

ANTONIO MERRITT

FELICITA GEE

and

OLIVER HARRIS

on or about August 17, 2006, at the City of Trenton, in the County of Mercer, at the Township of Woodbridge, 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, heroin, in a quantity of five ounces or more including any adulterants or dilutants, said crime being committed while the said ANTONIO MERRITT, FELICITA GEE and OLIVER HARRIS were knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(1), 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 - Second Degree)

ANTONIO MERRITT

on or about October 27, 2006, at the City of Trenton, in the County of Mercer, 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, said crime being committed while the said ANTONIO MERRITT was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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

(Conspiracy - Second Degree)

MICHAEL DAVIS

and other individuals whose identities are known to the Grand Jurors, who are co-conspirators but not defendants herein, between on or about August 8, 2006, and on or about August 30, 2006, at the City of Trenton, in the County of Mercer, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of distribution of 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 the said crimes, that is: 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:35-5(a)(1) and N.J.S.A. 2C:35-5(b)(2).

Said crime being committed while the said MICHAEL DAVIS was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h).

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 TWENTY-ONE

(Distribution of a Controlled
Dangerous Substance - Second Degree)

MICHAEL DAVIS

on or about August 30, 2006, at the City of Trenton, in the County of Mercer, 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, said crime being committed while the said MICHAEL DAVIS was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 TWENTY-TWO

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

MICHAEL DAVIS

on or about August 30, 2006, at the City of Trenton, in the County of Mercer, elsewhere, 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 500 feet of real property comprising a public housing facility, that is, the Carlos Negrón Park, located in the City of Trenton, which is owned by or leased to the City of Trenton and used for public housing purposes, said crime being committed while the said MICHAEL DAVIS was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 TWENTY-THREE

(Distribution of a Controlled
Dangerous Substance - Second Degree)

JAMES EDENS

on or about November 6, 2006, at the City of Trenton, in the County of Mercer, 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, said crime being committed while the said JAMES EDENS was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), 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 TWENTY-FOUR

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

ANTOINE TAYLOR

on or about November 6, 2006, at the City of Trenton, in the
County of Mercer, 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, said crime being committed while the said ANTOINE
TAYLOR was knowingly involved in criminal street gang related
activities as defined in N.J.S.A.

2C:44-3(h), contrary to the provisions of N.J.S.A.

2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(2), 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

(Obstructing Administration of Law or
Other Governmental Function - Fourth Degree)

ANTOINE TAYLOR

on or about November 6, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did obstruct, impair, or prevent the administration of law or other governmental function thereby obstructing the investigation or detection of a crime or the prosecution of James Edens for a crime, said crime being committed while the said ANTOINE TAYLOR was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:29-1, 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 - Second Degree)

ANTWON YEAGER

and

MYCAL BOONE

on or about February 1, 2007, at the City of Trenton, in the County of Mercer, 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, said crime being committed while the said ANTWON YEAGER was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Possession of Weapons during Commission
of Certain Crimes - Second Degree)

ANTWON YEAGER

and

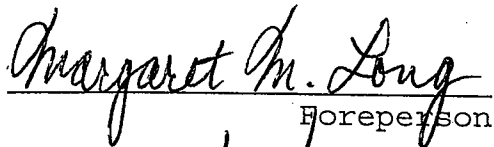
MYCAL BOONE

on or about February 1, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a .40 caliber High Point handgun, serial number 118708, while in the course of committing or attempting to commit, a violation of N.J.S.A. 2C:35-5a, said crime being committed while the said ANTWON YEAGER was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-4.1(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



AAG Gregory A. Paw
Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 8/24/2007