

SUPERIOR COURT OF N.J.
FILED

SEP 07 2007

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Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ540-07-1(2)
Superior Court
Docket Number 07-09-00125-S

STATE OF NEW JERSEY)
v.)
VALDO THOMPSON, JR.)
also known as)
"SB")
also known as)
"SOLDIER BOY")
CARL HOLDREN)
also known as)
"KILLA")
ZACKERY BUTTS)
also known as)
"ZOO")
QUEMERE MCCLEDON)
also known as)
"TRAGEDY")
PAUL LEWIS)
also known as)
"P-LEWIS")
DARNELL STOVALL)
Also known as)
"D-NELL")

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 7th day of September, 2007, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Monmouth 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 Monmouth for filing.

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

SUPERIOR COURT OF N.J.
FILED

SEP 07 2007

Andrew J. Hays
Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ 540-07-1(2)
Superior Court 07-09-00125-S
Docket Number _____

STATE OF NEW JERSEY)

v.)

INDICTMENT

VALDO THOMPSON, JR.)

also known as
"SB")

also known as
"SOLDIER BOY")

CARL HOLDREN)
also known as
"KILLA")

ZACKERY BUTTS)
also known as
"ZOO")

QUEMERE MCCLENDON)
also known as
"TRAGEDY")

PAUL LEWIS)
also known as
"P-LEWIS")

and)

DARNELL STOVALL)
also known as
"D-NELL")

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

COUNT ONE

(Racketeering - First Degree)

VALDO THOMPSON, JR.

CARL HOLDREN

ZACKERY BUTTS

and

QUEMERE MCCLENDON

and other persons whose identities are known and unknown to the Grand Jurors, who are 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 August 2006, and on or about February 2007, at the City of Trenton, in the County of Mercer, at the City of Asbury Park, and

at the City of Long Branch, both in the County of Monmouth, at the Township of Jackson, and at the Township of Lakewood, both in the County of Ocean, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

VALDO THOMPSON, JR., CARL HOLDREN, ZACKERY BUTTS, QUEMERE MCCLENDON, Iyonna Greshan, Anthony Carter, Wesley Kelly, and other persons whose identities are known and unknown to the Grand Jurors, did constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, namely the "Sex Money Murder" set of the Bloods street gang.

THE PURPOSES OF THE ENTERPRISE

The purpose of the enterprise was to distribute controlled dangerous substances and commit robberies to earn money for members of the Sex Money Murder set. The leadership of the enterprise organized and directed the subordinate members to distribute or transport within this State controlled dangerous substances and to commit robberies. The enterprise functioned through a structured chain of command. Its members had specific ranks and titles which 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 the Sex Money Murder set drug distribution areas and the Sex Money Murder members set 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 Murder (N.J.S.A. 2C:11-3), Attempted Murder (N.J.S.A. 2C:11-3), Robbery (N.J.S.A. 2C: 15-1), Burglary (N.J.S.A. 2C:18-2), 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), Possession of Weapons for Unlawful Purposes (N.J.S.A. 2C:39-4), or Conspiracies to commit these crimes, as described herein and in Counts Two through Twenty-Three of this Indictment.

VALDO THOMPSON, JR.

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Murder, Possession of a Weapon for an Unlawful Purpose, 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, 3, 4, 5, 6, 18, 19, 20, and 21 of this Indictment.

CARL HOLDREN

did commit the racketeering conduct by engaging in or conspiring to commit the crimes Murder, Possession of a Weapon for an Unlawful Purpose, Distribution of a Controlled Dangerous Substance, Possession with Intent to Distribute a Controlled Dangerous Substance, and Robbery, which racketeering conduct is the subject of Counts 2, 3, 4, 5, 6, 7, 8, 9, 19, 20, and 21 of this Indictment.

QUEMERE MCCLENDON

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Murder, Felony Murder, and Possession of a Weapon for an Unlawful Purpose, which racketeering conduct is the subject of Counts 2, 3, 4, 5, and 6 of this Indictment.

ZACKERY BUTTS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes Murder and Possession of a Weapon for an Unlawful Purpose, which racketeering conduct is the subject of Counts 19, 20, and 21 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

(Conspiracy - First Degree)

VALDO THOMPSON, JR.

CARL HOLDREN

and

QUEMERE MCCLENDON

between on or about November 20, 2006, and on or about November 22, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

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

Purposely to cause the death of Keith Logan, contrary to the provisions of N.J.S.A. 2C:11-3.

Said crime being committed while the said VALDO THOMPSON, JR., CARL HOLDREN, and QUEMERE MCCLENDON 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 THREE

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

VALDO THOMPSON, JR.

CARL HOLDREN

and

QUEMERE MCCLENDON

on or about November 22, 2006, at the City of Long Branch,
in the County of Monmouth, elsewhere, and within the
jurisdiction of this Court, did possess a certain firearm, that
is, an unknown make and model handgun, with the purpose to use it
unlawfully against the person of another, to wit, Keith
Logan, said crime being committed while the said VALDO THOMPSON,
JR., CARL HOLDREN, and QUEMERE MCCLENDON 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:39-4a 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)

VALDO THOMPSON, JR.

CARL HOLDREN

and

QUEMERE MCCLENDON

on or about November 22, 2006, at the City of Long Branch in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of Keith Logan, said crime being committed while the said VALDO THOMPSON, JR., CARL HOLDREN, and QUEMERE MCCLENDON 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:11-3a, N.J.S.A. 2C:5-1, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

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

VALDO THOMPSON, JR.

CARL HOLDREN

and

QUEMERE MCCLENDON

on or about November 22, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, did possess a certain firearm, that is, an unknown make and model handgun, with purpose to use it unlawfully against the person of another, to wit, Michael Montgomery, said crime being committed while the said VALDO THOMPSON, JR., CARL HOLDREN, and QUEMERE MCCLENDON 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:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Murder - First Degree)

VALDO THOMPSON, JR.

CARL HOLDREN

and

QUEMERE MCCLENDON

on or about November 22, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did cause the death of Michael Montgomery, or knowingly or purposely did cause serious bodily injury resulting in the death of Michael Montgomery, said crime being committed while the said VALDO THOMPSON, JR., CARL HOLDREN, and QUEMERE MCCLENDON 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:11-3a(1), N.J.S.A. 2C:11-3a(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Conspiracy - Second Degree)

CARL HOLDREN

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not defendants herein, on or about December 12, 2006, at the Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of robbery, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

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

To commit a robbery, that is, while in the course of committing a theft, knowingly did threaten immediate bodily injury upon J. H., or purposely did put J. H. in fear of immediate bodily injury, while one of more of them would be armed with or threaten the immediate use of a deadly weapon, contrary to the provisions of N.J.S.A. 2C:15-1.

Said crime being committed while the said CARL HOLDREN 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 EIGHT

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

CARL HOLDREN

on or about December 12, 2006, at Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, did possess a certain firearm, that is, an unknown make and model handgun, with the purpose to use it unlawfully against the person of another, to wit, J. H., said crime being committed while the said CARL HOLDREN 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 NINE

(Robbery - First Degree)

CARL HOLDREN

and other individuals whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about December 12, 2006, at the Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, while in the course of committing a theft, knowingly did threaten immediate bodily injury upon J. H., or purposely did put J. H. in fear of immediate bodily injury, while one or more of them was armed with or threatened the use of a deadly weapon, that is, a handgun, said crime being committed while the said CARL HOLDREN 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:15-1a(2) and N.J.S.A. 2C:2-6; and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Conspiracy - Second Degree)

QUEMERE MCCLENDON

PAUL LEWIS

and

DARNELL STOVALL

on or about December 14, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of burglary and robbery, did agree that:

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

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

1. To commit a burglary, that is, knowingly to enter the structure of Keith Mason, located at 49 2nd Avenue, Apartment 1, Long Branch, New Jersey, with the purpose to commit an offense therein, while one or more of them would be armed with or displaying what appeared to be a deadly weapon, contrary to the provisions of N.J.S.A. 2C:18-2.

2. To commit a robbery, that is, while in the course of committing a theft, knowingly would threaten immediate bodily injury upon Keith Mason, or would purposely put Keith Mason in fear of immediate bodily injury, while one or more of them would

be armed with or threaten the immediate use of a deadly weapon,
contrary to the provisions of N.J.S.A. 2C:15-1.

Said crime being committed while the said PAUL LEWIS,
DARNELL STOVALL, and QUEMERE MCCLENDON 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 ELEVEN

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

QUEMERE MCCLENDON

PAUL LEWIS

and

DARNELL STOVALL

on or about December 14, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, did possess a certain firearm, that is, a .45 caliber handgun, serial number 338969, with purpose to use it unlawfully against the person of another, to wit, Keith Mason, said crime being committed while the said PAUL LEWIS, DARNELL STOVALL, and QUEMERE MCCLENDON 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:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Burglary - Second Degree)

QUEMERE MCCLENDON

PAUL LEWIS

and

DARNELL STOVALL

on or about December 14, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure of Keith Mason, located at 49 2nd Avenue, Apartment 1, Long Branch, New Jersey, with purpose to commit an offense therein, and in the course of committing the said offense one or more of them were armed with a deadly weapon, or displayed what appeared to be a deadly weapon, or purposely, knowingly or recklessly did inflict bodily injury on the said Keith Mason, said crime being committed while the said PAUL LEWIS, DARNELL STOVALL, and QUEMERE MCCLENDON 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:18-2 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Robbery - First Degree)

QUEMERE MCCLENDON

PAUL LEWIS

and

DARNELL STOVALL

on or about December 14, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, while in the course of committing a theft, knowingly did inflict bodily injury or use force upon Keith Mason, or did threaten Keith Mason with or purposely did put Keith Mason in fear of immediate bodily injury, and during the course of committing the said theft, the said QUEMERE MCCLENDON, PAUL LEWIS, and DARNELL STOVALL purposely did inflict serious bodily injury on Keith Mason, or one or more of them were armed with or threatened the immediate use of a deadly weapon, said crime being committed while the said QUEMERE MCCLENDON, PAUL LEWIS, and DARNELL STOVALL 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:15-1a(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

(Felony Murder - First Degree)

QUEMERE MCCLENDON

PAUL LEWIS

and

DARNELL STOVALL

on or about December 14, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, while engaged in committing, attempting to commit or engaged in flight after committing a robbery, did cause the death of Keith Mason, or while engaged in committing, attempting to commit or engaged in flight after committing a burglary, did cause the death of Keith Mason, said crime being committed while the said PAUL LEWIS, DARNELL STOVALL, and QUEMERE MCCLENDON 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:11-3a(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Murder - First Degree)

QUEMERE MCCLENDON

PAUL LEWIS

and

DARNELL STOVALL

on or about December 14, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did cause the death of Keith Mason, or knowingly or purposely did cause serious bodily injury resulting in the death of Keith Mason, said crime being committed while the said PAUL LEWIS, DARNELL STOVALL, and QUEMERE MCCLENDON 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:11-3a(1), N.J.S.A. 2C:11-3a(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Endangering the Welfare of a Child - Third Degree)

QUEMERE MCCLENDON

PAUL LEWIS

and

DARNELL STOVALL

on or about December 14, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly did cause harm to M. M., having a date of birth of 12/16/2004, making M. M. an abused or neglected child as defined in N.J.S.A. 9:6-1, N.J.S.A. 9:6-3, and N.J.S.A. 9:6-8.21, that is, did shoot and kill M. M.'s father, Keith Mason, while M. M. was present in the room and then left M. M. in the room with his deceased father with no other adults present, contrary to the provisions of N.J.S.A. 2C:24-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Witness Tampering - Second Degree)

QUEMERE MCCLENDON

and

PAUL LEWIS

on or about December 14, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, 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 A. D. to withhold information, by the employment of force, contrary to the provisions of N.J.S.A. 2C:28-5a 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 - Third Degree)

VALDO THOMPSON, 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 December 25, 2006, and on or about December 26, 2006, at the City of Trenton, in the County of Mercer, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, to a juvenile, S. K., said crime being committed while VALDO THOMPSON JR. 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(3), N.J.S.A. 2C:35-8, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Conspiracy - First Degree)

VALDO THOMPSON, JR.

CARL HOLDREN

and

ZACKERY BUTTS

on or about December 28, 2006, at the Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

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

To purposely cause the death of Michael Stallworth, contrary to the provisions of N.J.S.A. 2C:11-3.

Said crime being committed while the said VALDO THOMPSON, JR., CARL HOLDREN, and ZACKERY BUTTS 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 TWENTY

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

VALDO THOMPSON, JR.

CARL HOLDREN

and

ZACKERY BUTTS

on or about December 28, 2006, at the Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, did possess a firearm, that is, a .45 caliber handgun, serial number 338969, with purpose to use it unlawfully against the person of another, to wit, Michael Stallworth, said crime being committed while VALDO THOMPSON, JR., CARL HOLDREN, and ZACKERY BUTTS 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:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Attempted Murder - First Degree)

VALDO THOMPSON, JR.

CARL HOLDREN

and

ZACKERY BUTTS

on or about December 28, 2006, at the Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of Michael Stallworth, said crime being committed while VALDO THOMPSON JR., CARL HOLDREN, and ZACKERY BUTTS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:11-3a, N.J.S.A. 2C:5-1, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

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

VALDO THOMPSON, JR.

and other individuals whose identities are known to the Grand Jurors, who are co-conspirators but not defendants herein, on or about December 31, 2006, at the City of Trenton, in the County of Mercer, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, said crime being committed while VALDO THOMPSON, JR. 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(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-THREE

(Prohibited Weapons - Third Degree)

VALDO THOMPSON, JR.

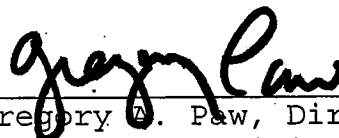
on or about December 31, 2006, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did possess a sawed-off shotgun, said crime being committed while the said VALDO THOMPSON, JR. was knowingly involved in criminal street gang related activities as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:39-3b, and against the peace of this State, and dignity of the same.

COUNT TWENTY FOUR

(Certain Persons not to Have Weapons - Second Degree)

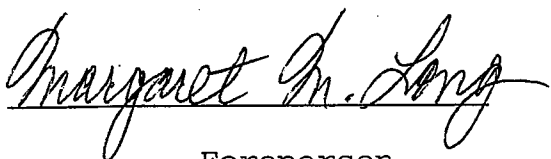
QUEMERE MCLENDON

on or about December 14, 2006, at the City of Long Branch, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Aggravated Assault on June 24, 2005, in the County of Monmouth, State of New Jersey under accusation number 05-04-01002A did own, possess or control a .45 caliber handgun, contrary to the provisions of N.J.S.A. 2C:39-7(b), and against the peace of this State, the government and dignity of the same.



Gregory A. Paw, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 9/7/07