

SUPERIOR COURT OF N.J.
FILED

AUG 02 2007

Andrew J. Hing
Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION -- CRIMINAL

State Grand Jury

Number SGJ 544-07-13

Superior Court

Docket Number 07-08-00104-S

STATE OF NEW JERSEY)

V.)

INDICTMENT

MOHAMED HASSANAIN)

also known as)

"MOHAMED ALY")

AHMED ALY)

also known as)

"FELIX")

WILLIAM S. LEONARD)

also known as)

"OLD MAN WILL")

WILL T. JORDON)

TERRY A. BROOKS)

TEREKE M. HAMMOND)

also known as)

"BETTY LEE")

ENIN MARTIN)

WOODROW NEWTON)

also known as)

"ALI")

STEPHANIE MC LUCAS)

also known as)

"SARA")

JASON EDWIN ALLEN, JR.)

EDWIN POLANCO)

also known as)

"GRANDE")

RAUL CRUZ)

IAN A. BURROWES)
AARON BURROWES)
RICK TERRELL)
TASHEEMAH N. TYSON)
also known as)
"SHEEMA")
KIMYATTA L. JONES)
JASHIMA BRICE)
also known as)
"JOYCE")
and)
PATRICIA FUDGE)

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

COUNT ONE

(Racketeering - First Degree)

MOHAMED HASSANAIN

AHMED ALY

WILLIAM S. LEONARD

WILL T. JORDON

TERRY A. BROOKS

TEREKE M. HAMMOND

ENIN MARTIN

WOODROW NEWTON

STEPHANIE MC LUCAS

JASON EDWIN ALLEN, JR.

EDWIN POLANCO

RAUL CRUZ

IAN A. BURROWES

AARON BURROWES

RICK TERRELL

TASHEEMAH N. TYSON

KIMYATTA L. JONES

JASHIMA BRICE

and

PATRICIA FUDGE

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members of the criminal enterprise but not named as 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, purposely or knowingly did conduct or participate directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, in violation of N.J.S.A. 2C:41-2c and N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES

1. The predicate criminal activity occurred between in or about July 2005, and in or about January 2007.

THE RELEVANT PLACES

2. The predicate criminal activity took place at the City of East Orange, at the Township of Livingston, at the Township of Maplewood, at the City of Newark, and at the Township of West Orange, all in the County of Essex, at the Township of Hillside, and at the Township of Union, both in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

3. MOHAMED HASSANAIN, AHMED ALY, WILLIAM S. LEONARD, WILL T. JORDON, TERRY A. BROOKS, TEREKE M. HAMMOND, ENIN MARTIN, WOODROW NEWTON, STEPHANIE MC LUCAS, JASON EDWIN ALLEN, JR., EDWIN POLANCO, RAUL CRUZ, IAN A. BURROWES, AARON BURROWES, RICK TERRELL, TASHEEMAH N. TYSON, KIMYATTA L. JONES, JASHIMA BRICE, and PATRICIA FUDGE; all of whom are co-conspirators; and Doctor Mario Comesanas who is likewise a conspirator and member of the enterprise although not charged herein; and other persons whose identities are both known and unknown to the State Grand Jurors, would constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a union or group of individuals associated in fact, or associates thereof, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise would include the unlawful bulk distribution of prescription controlled dangerous substances

in exchange for United States currency accomplished as follows. The enterprise had a leadership which financed, organized, supervised and managed the subordinate members in a common course of conduct to distribute and transport within and without this State, controlled dangerous substances, including those classified in Schedule II, including but not limited to: percocet, oxycontin, oxycodone, roxycontin, and others. The enterprise consisted of a number of "runners" who would provide lists of names/identities on a weekly or bi-weekly basis to be used in the generation of fraudulent prescriptions for controlled dangerous substances. The lists were collected from the runners by a number of street level coordinators within the enterprise who subsequently turned over the lists to the management members of the enterprise who aggregated all the lists in preparation for obtaining the necessary prescriptions. The enterprise further consisted of a medical doctor, who utilized his New Jersey medical license on a regular basis, often bi-weekly, to generate illicit prescriptions for thousands of pills of controlled dangerous substances for individuals whom he never saw, who did not authorize that act, or who did not exist, all in exchange for United States Currency. These fraudulently generated prescriptions, along with the cash necessary to fill the prescriptions, in turn were redistributed down the enterprise through the various levels until they reached the runners who

initially provided the names/identities for the lists. The runners would utilize the fraudulently generated prescriptions to obtain the controlled dangerous substances from certain pharmacies that employed individuals who knowingly filled the fraudulent prescriptions. Once obtained, the controlled dangerous substances were collected by members of the enterprise and the runners were paid United States currency. Through this artifice, the enterprise accumulated thousands of prescription narcotic pills each week which in turn were sold in bulk for United States currency by the management members of this enterprise to individuals whose identities are known and unknown to the State Grand Jurors.

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); unlawful distribution of controlled dangerous substances (N.J.S.A. 2C:35-5 et seq.); possession with intent to distribute controlled dangerous substances (N.J.S.A. 2C:35-5 et seq.); possession with intent to distribute controlled dangerous substances within 1000 feet of school property (N.J.S.A. 2C:35-7); possession with intent to distribute controlled dangerous

substances within 500 feet of public property (N.J.S.A. 2C:35-7.1); forgery (N.J.S.A. 2C:21-1); identity theft (N.J.S.A. 2C:21-17); money laundering (N.J.S.A. 2C:21-25) involving property valued in excess of \$500,000, possession of a weapon for an unlawful purpose (N.J.S.A. 2C:39-4a); possession of firearms while in course of committing CDS offenses (N.J.S.A. 2C:39-4.1) failure to file tax returns or reports (N.J.S.A. 54:52-8); failure to pay gross income taxes (N.J.S.A. 54:52-9), and conspiracy to commit the foregoing crimes (N.J.S.A. 2C:5-2), which included in part, the use of firearms, primarily in the following ways:

MOHAMED HASSANAIN

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of leading a narcotics trafficking network, unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances within 1000 feet of school property, unlawful possession with intent to distribute controlled dangerous substances within 500 feet of public, unlawful possession of firearms during commission of CDS offenses, money laundering, failure to file tax returns or reports, failure to pay gross income tax, all of which is the

subject of Counts 2, 3, 4, 5, 6, 8, 13, 14, 15, 16, 17, 18, 19, 25, 26, 29, and 30 of this Indictment.

AHMED ALY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

WILLIAM S. LEONARD

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

WILL T. JORDAN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 11, 17, 18, and 19 of this Indictment.

TERRY A. BROOKS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

TEREKE M. HAMMOND

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, possession of a weapon for an unlawful purpose, all of which is the subject of Counts 3, 7, 17, 18, 19, and 20, of this Indictment.

ENIN MARTIN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

WOODROW NEWTON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

STEPHANIE MC LUCAS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, possession with intent to distribute controlled dangerous substances within 1000 feet of school property, forgery, identity theft, money laundering, failure to file tax returns or reports, failure to pay gross income tax, all of which is the subject of Counts 3, 9, 10, 17, 18, 19, 28, 33, and 34 of this Indictment.

JASON EDWIN ALLEN, JR.

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

EDWIN POLANCO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

RAUL CRUZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

IAN A. BURROWES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, money laundering, failure to file tax returns or reports, failure to pay gross income tax, all of which is the subject of Counts 3, 12, 17, 18, 19, 27, 31, and 32 of this Indictment.

AARON BURROWES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 12, 17, 18, and 19 of this Indictment.

RICK TERRELL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

TASHEEMAH N. TYSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

KIMYATTA L. JONES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled

dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

JASHIMA BRICE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

PATRICIA FUDGE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful distribution of controlled dangerous substances, unlawful possession with intent to distribute controlled dangerous substances, forgery, identity theft, all of which is the subject of Counts 3, 17, 18, and 19 of this Indictment.

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.

FORFEITURES

1. All allegations heretofore set forth are hereby incorporated by reference and re-alleged as if fully set forth herein, for the purpose of alleging forfeitures pursuant to N.J.S.A. 2C:41-3b.

2. The defendants have property constituting:

A. Interests, including money and other things of value, established, acquired, maintained, operated, controlled, conducted, or participated in violation of N.J.S.A. 2C:41-2c, and N.J.S.A. 2C:41-2d.

3. The said interests, all subject to forfeiture to the State of New Jersey, shall expressly include the following:

- A. Block 158.20 Lot 8- 30 Edgar Rd., West Orange, Essex County, NJ
Owner: Mohamed Aly
- B. Block 3027.01 Lot 8 98-100 Osborne Terr. Newark, Essex County, NJ
Owner: Mohamed Aly
- C. Block 3033 Lot 10- 16-20 Ingraham Pl. A/K/A/ 332 Clinton Ave., Newark, Essex County NJ
Owner: Mohamed Hassanain
- D. Block 116 Lot 80- 389 Halsey St., Newark, Essex County, NJ
Owner: Mohamed Aly / Halsey Investments Group
- E. Block 56 Lot 6-21 No. 18th St., Newark, Essex County, NJ
Owner: Mohamed Aly
- F. Block 506 Lot 9 - 56 Highland Ave., Newark, Essex County, NJ
Owner: Mohamed Aly

- G. Block 1814 Lot 54 - 222 South Eleventh St.,
Newark, Essex County, NJ
Owner: Mohamed Aly
- H. Block 2692 Lot 11 - 117 Ridgewood Ave., Newark,
Essex County, NJ
Owner: Mohamed Aly
- I. Block 3078 Lot 25 - 18 Fabyan Pl., Newark,
Essex County, NJ
Owner: Mohamed Aly
- J. Block 3697 Lot 4 - 47 Park View Terr., Newark,
Essex County, NJ
Owner: Mohamed Aly
- K. Block 3950 Lot 30 - 214 Hawthorne Ave., Newark,
Essex County, NJ
Owner: Mohamed Aly / Hawthorne Investments Group
- L. Block 246 Lot 16 - 42 Quabeck Ave., Irvington,
Essex County, NJ
Owner: Mohamed Aly / Yaz Investments Inc.
- M. Block 257 Lot 6 - 348 Springfield Ave., Newark,
Essex County, NJ
Owner: Mohamed Hassanain
- N. Block 56 Lot 1778 - 196 So. 6th Street, Newark,
Essex County, NJ
Owner: Mohamed Hassanain
- O. Block 2648 Lot 41 - 796 So. 14th Street, Newark,
Essex County, NJ
Owner: Mohamed Aly / Ian Burrowes
- P. Block 2618 Lot 21, 661-667 So. 11th St., Newark,
Essex County, NJ
Owner: Mohamed Aly / Eleven St. Investments Inc.
- Q. The sum of \$10,092.00 recovered from the person of
Mohamed Hassanain.
- R. The sum of \$22,090.00 recovered from the person of
Stephanie Mc Lucas.

- S. The sum of \$49,870.00 recovered from the safe ay
2051 Springfield Ave., Union Twp., USA Bail Bonds.
- T. One 2007 Mercedes Benz, S-550, white in color,
vehicle identification number WDDNG71X07A046119,
owned by EME Towing LLC / Mohamed Hassanain,
principal.

COUNT TWO

(Leader of Narcotics Trafficking Network - First Degree)

MOHAMED HASSANAIN

between in or about July 2005, and in or about January 2007, at the City of East Orange, at the Township of Livingston, at the Township of Maplewood, at the City of Newark, and at the Township of West Orange, all in the County of Essex, at the Township of Hillside, and at the Township of Union, both in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with AHMED ALY, WILLIAM S. LEONARD, WILL T. JORDON, TERRY A. BROOKS, TEREKE M. HAMMOND, ENIN MARTIN, WOODROW NEWTON, STEPHANIE MC LUCAS, JASON EDWIN ALLEN, JR., EDWIN POLANCO, RAUL CRUZ, IAN A. BURROWES, AARON BURROWES, RICK TERRELL, TASHEEMAH N. TYSON, KIMYATTA L. JONES, JASHIMA BRICE, PATRICIA FUDGE; and Doctor Mario Comesanas who is likewise a conspirator although not charged herein, and other persons whose identities are both and unknown to the Grand Jurors, as an organizer, supervisor, financier or manager of said individuals, to engage for profit in a scheme or course of conduct to unlawfully manufacture, distribute, dispense, bring into or transport in this State Schedule II controlled dangerous substances, including but not limited to: percocet, oxycontin, oxycodone, roxycontin, 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

(Conspiracy - Second Degree)

MOHAMED HASSANAIN

AHMED ALY

WILLIAM LEONARD

WILL T. JORDAN

TERRY A. BROOKS

TEREKE M. HAMMOND

ENIN MARTIN

WOODROW NEWTON

STEPHANIE MC LUCAS

JASON EDWIN ALLEN, JR.

EDWIN POLANCO

RAUL CRUZ

IAN A. BURROWES

AARON BURROWES

RICK TERRELL

TASHEEMAH N. TYSON

KIMYATTA L. JONES

JASHIMA BRICE

and

PATRICIA FUDGE

between in or about July 2005, and in or about January 2007, at
the City of East Orange, at the Township of Livingston, at the

Township of Maplewood, at the City of Newark, and at the Township of West Orange, all in the County of Essex, at the Township of Hillside, and at the Township of Union, both in the County of Union, in the State of New York, 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 controlled dangerous substances, did agree that:

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

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

1. Knowingly or purposely distribute a controlled dangerous substance, that is, Schedule II controlled dangerous substances classified as narcotic drugs, in the aggregate quantity of one 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)(4).

2. Knowingly or purposely possess with intent to distribute a controlled dangerous substance, that is, Schedule II controlled dangerous substances classified as narcotic drugs, in the aggregate quantity of one 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)(4).

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 FOUR

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

MOHAMED HASSANAIN

on or about January 25, 2007, at the City of Newark, in the
County of Essex, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did possess or have under his
control with intent to distribute a controlled dangerous
substance, that is Oxycodone, a Schedule II narcotic drug, in a
quantity of one ounce or more including any adulterants or
dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1),
N.J.S.A. 2C:35-5(b)(4), and N.J.S.A. 2C:2-6, and against the
peace of this State, the government and dignity of the same.

COUNT FIVE

(Possession with Intent to Distribute a
Controlled Dangerous Substance within 1000
Feet of School Property - Third Degree)

MOHAMED HASSANAIN

on or about January 25, 2007, at the City of Newark, in the
County of Essex, and within the jurisdiction of this Court,
knowingly or purposely did possess with intent to distribute a
controlled dangerous substance, that is, Oxycodone, a Schedule II
narcotic drug, in violation of N.J.S.A. 2C:35-5a while within
1000 feet of Malcome X. Shabazz High School, which is owned by or
leased to the Newark 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 SIX

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

MOHAMED HASSANAIN

on or about January 25, 2007, at the City of Newark, in the
County of Essex, and within the jurisdiction of this Court,
knowingly or purposely did possess with intent to distribute a
controlled dangerous substance, that is, Oxycodone, a Schedule II
narcotic drug, in violation of N.J.S.A. 2C:35-5a, while within
500 feet of the Newark Housing Authority NJ2-53D located at 1-7
Madison Avenue and NJ2-53E located at 321-337 Irvine Turner
Boulevard, a public housing facility, public park, or public
building, 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 SEVEN

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

TEREKE M. HAMMOND

on or about October 20, 2006, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess or have under his control with intent to distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

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

MOHAMED HASSANAIN

on or about January 25, 2007, at the Township of West Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess or have under his control with intent to distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

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

STEPHANIE MC LUCAS

on or about January 25, 2007, at the Township of Maplewood, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess or have under her control with intent to distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Possession with Intent to Distribute a
Controlled Dangerous Substance within
1000 Feet of School Property - Third Degree)

STEPHANIE MC LUCAS

on or about January 25, 2007, at the Township of Maplewood, in the County of Essex, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in violation of N.J.S.A. 2C:35-5a, while within 1000 feet of Seth Boyden Elementary School, which is owned by or leased to the Maplewood 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 ELEVEN

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

WILL T. JORDAN

on or about January 25, 2007, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess or have under his control with intent to distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(4), 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 - Second Degree)

IAN A. BURROWES

and

AARON BURROWES

on or about January 25, 2007, at the Township of Union, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess or have under their control with intent to distribute a controlled dangerous substance, that is, Oxycodone/Acetaminophen, a Schedule II narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

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

MOHAMED HASSANAIN

on or about January 25, 2007, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess or have under his control with intent to distribute a controlled dangerous substance, that is Oxycodone/Acetaminophen, a Schedule II narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(4), 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 within 500 Feet of Certain
Public Property - Second Degree)

MOHAMED HASSANAIN

on or about January 25, 2007, at the City of Newark, in the
County of Essex, and within the jurisdiction of this Court,
knowingly or purposely did possess with intent to distribute a
controlled dangerous substance, that is, Oxycodone/Acetaminophen,
a Schedule II narcotic drug, in violation of N.J.S.A. 2C:35-5a,
while within 500 feet of the Newark Housing Authority Project:
Woodland Village, a public housing facility, public park, or
public building, 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 FIFTEEN

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

MOHAMED HASSANAIN

on or about January 25, 2007, at the Township of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess or have under his control with intent to distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in a quantity of one ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Possession with Intent to Distribute a
Controlled Dangerous Substance within
1000 Feet of School Property - Third Degree)

MOHAMED HASSANAIN

on or about January 25, 2007, at the Township of Irvington, in the County of Essex, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, Oxycodone, a Schedule II narcotic drug, in violation of N.J.S.A. 2C:35-5a, while within 1000 feet of the Union Avenue School, which is owned by or leased to the Irvington 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 SEVENTEEN

(Conspiracy - Second Degree)

MOHAMED HASSANAIN

AHMED ALY

WILLIAM S. LEONARD

WILL T. JORDAN

TERRY A. BROOKS

TEREKE M. HAMMOND

ENIN MARTIN

WOODROW NEWTON

STEPHANIE MC LUCAS

JASON EDWIN ALLEN, JR.

EDWIN POLANCO

RAUL CRUZ

IAN A. BURROWES

AARON BURROWES

RICK TERRELL

TASHEEMAH N. TYSON

KIMYATTA L. JONES

JASHIMA BRICE

and

PATRICIA FUDGE

and other persons whose identities are known and unknown to the
Grand Jurors, who are co-conspirators and members of the criminal

enterprise but are not named as defendants herein, between in or about July 2005, and in or about January 2007, at the City of East Orange, at the Township of Livingston, at the Township of Maplewood, at the City of Newark, and at the Township of West Orange, all in the County of Essex, at the Township of Hillside, and at the Township of Union, both in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of forgery and theft of identity, did agree that:

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

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

1. Knowingly and with the purpose to defraud or injure another, making, completing, executing, authenticating, issuing, transferring, or uttering writings so that they purport to be the act of another who did not authorize that act or the act of a fictitious person, specifically by generating New Jersey prescription forms authorizing the dispensing of controlled dangerous substances in the names/identities of individuals never treated by a medical doctor, who did not authorize that act having a prescription for narcotics issued in their name, or who

were fictitious, all in exchange for United States currency, contrary to the provisions of N.J.S.A. 2C:21-1; and

2. Knowingly obtaining the personal identifying information pertaining to another and knowingly using that information, or assisting another in using that information, in order to assume the identity of or represent themselves as another person, without that person's authorization and with the purpose to fraudulently obtain or attempt to obtain a benefit or services, specifically by obtaining and using the personal identifying information of in excess of five individuals whose names were placed on New Jersey Prescriptions unlawfully authorizing the dispensing of controlled dangerous substances; all in exchange for United States Currency in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:21-17(a)(4).

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

(Forgery - Third Degree)

MOHAMED HASSANAIN

AHMED ALY

WILLIAM S. LEONARD

WILL T. JORDAN

TERRY A. BROOKS

TEREKE M. HAMMOND

ENIN MARTIN

WOODROW NEWTON

STEPHANIE MC LUCAS

JASON EDWIN ALLEN, JR.

EDWIN POLANCO

RAUL CRUZ

IAN A. BURROWES

AARON BURROWES

RICK TERRELL

TASHEEMAH N. TYSON

KIMYATTA L. JONES

JASHIMA BRICE

and

PATRICIA FUDGE

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members of the criminal

enterprise but not named as defendants herein, between in or about July 2005, and in or about January, 2007, at the City of East Orange, at the Township of Livingston, at the Township of Maplewood, at the City of Newark, at the Township of West Orange; all in the County of Essex, at the Township of Hillside, and at the Township of Union, both in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, with the purpose to defraud or injure another or knowledge they were facilitating a fraud or injury to be perpetrated by another, knowingly did make, complete, execute, authenticate, issue, transfer, or utter writings so that they purport to be the act of another who did not authorize that act or the act of a fictitious person, specifically, by making, completing, executing, authenticating, issuing, transferring, or uttering, New Jersey Prescriptions authorizing the dispensing of controlled dangerous substances in the names/identities of individuals who were never seen or treated by the medical doctor who was a conspirator and member of the criminal enterprise herein; who did not authorize that act having a prescription for narcotics issued in their name, or who were fictitious, all in exchange for United States currency, contrary to the provisions of N.J.S.A. 2C:21-1(a)(2), N.J.S.A. 2C:21-1(a)(3), and N.J.S.A. 2C:2-6; and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Theft of Identity - Second Degree)

MOHAMED HASSANAIN

AHMED ALY

WILLIAM S. LEONARD

WILL T. JORDAN

TERRY A. BROOKS

TEREKE M. HAMMOND

ENIN MARTIN

WOODROW NEWTON

STEPHANIE MC LUCAS

JASON EDWIN ALLEN, JR.

EDWIN POLANCO

RAUL CRUZ

IAN A. BURROWES

AARON BURROWES

RICK TERRELL

TASHEEMAH N. TYSON

KIMYATTA L. JONES

JASHIMA BRICE

and

PATRICIA FUDGE

and other persons whose identities are known and unknown to the
Grand Jurors, who are co-conspirators and members of the criminal

enterprise but not named as defendants herein, between in or about July 2005, and in or about January 2007, at the City of East Orange, at the Township of Livingston, at the Township of Maplewood, at the City of Newark, and at the Township of West Orange, all in the County of Essex at the Township of Hillside, and at the Township of Union, both in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, knowingly did obtain the personal identifying information pertaining to another and knowingly did use that information; or assist another in using that information, in order to assume the identity of or represent themselves as another person, without that person's authorization and with the purpose to fraudulently obtain or attempt to obtain a benefit or services, specifically by obtaining and using the personal identifying information of in excess of five individuals whose names were placed on New Jersey Prescriptions unlawfully authorizing the dispensing of controlled dangerous substances; all in exchange for United States currency in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:21-17(a)(4) and N.J.S.A. 2C:2-6; 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)

TEREKE HAMMOND

on or about January 16, 2007, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain firearm, that is, a .380 caliber Bersa semi-automatic pistol, serial number 624268, with purpose to use it unlawfully against the person or property of another, 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

(Certain Persons Not To Have Weapons - Second Degree)

TEREKE HAMMOND

on or about January 16, 2007, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, having been previously convicted on two separate occasions of the crime of distribution of controlled dangerous substances within 1000 feet of school property (N.J.S.A. 2C:35-7) on Essex County Indictment 98-12-4942 and Essex County Accusation A867-6-95, did possess a certain firearm, that is, a .380 caliber Bersa semi-automatic pistol, serial number 624268, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Certain Persons Not To Have Weapons - Second Degree)

MOHAMED HASSANAIN

on or about January 25, 2007, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, having been previously convicted of the crime of distribution of a controlled dangerous substance within 1000 feet of school property (N.J.S.A. 2C:35-7) on Bergen County Indictment S-0260-94, did possess certain firearms, that is, one .357 Magnum caliber Colt revolver, serial number L34635, one .44 Magnum caliber Smith & Wesson revolver, serial number N667693, one 8mm Nambu caliber Naygoya Army Ordinance semiautomatic pistol, serial number 72729, .44 Magnum caliber Ruger revolver, serial number 83-31868, and one .30 carbine caliber universal semiautomatic pistol, serial number 334578, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Unlawful Possession of a Weapon - Third Degree)

MOHAMED HASSANAIN

on or about January 25, 2007, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess certain weapons, that is, one .357 Magnum caliber Colt revolver, serial number L34635, one .44 Magnum caliber Smith & Wesson revolver, serial number N667693, one 8mm Nambu caliber Naygoya Army Ordinance semiautomatic pistol, serial number 72729, .44 Magnum caliber Ruger revolver, serial number 83-31868, and one .30 carbine caliber universal semiautomatic pistol, serial number 334578, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-3, 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 the same.

COUNT TWENTY-FOUR

(Unlawful Possession of an Assault Firearm - Third Degree)

MOHAMED HASSANAIN

on or about January 25, 2007, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, one 9mm Luger caliber Intratec TEC-9 semiautomatic pistol, serial number 07549, without first having licensed same as provided in N.J.S.A. 2C:58-5, registered same as provided in N.J.S.A. 2C:58-12, or rendered inoperable same as provided in N.J.S.A. 2C:58-13, contrary to the provisions of N.J.S.A. 2C:39-5f 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 of Weapons During Commission
of Certain Crimes - Second Degree)

MOHAMED HASSANAIN

on or about January 25, 2007, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess certain firearms, including one .357 Magnum caliber Colt revolver, serial number L34635, one .44 Magnum caliber Smith & Wesson revolver, serial number N667693, one 8mm Nambu caliber Naygoya Army Ordinance semiautomatic pistol, serial number 72729, .44 Magnum caliber Ruger revolver, serial number 83-31868, one .30 carbine caliber universal semiautomatic pistol, serial number 334578, and one 9mm Luger caliber Intratec TEC-9 semiautomatic pistol, serial number 07549, while in the course of committing or attempting to commit or conspiring to commit violations of N.J.S.A. 2C:35-3, or N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1(a), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Money Laundering - First Degree)

MOHAMED HASSANAIN

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants, between in or about July 2005, and in or about January 2007, at the City of East Orange, at the Township of Livingston, at the Township of Maplewood, at the City of Newark, and at the Township of West Orange, all in the County of Essex, at the Township of Hillside, and at the Township of Union, both in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, while engaged in the racketeering activity set forth in Count One of this Indictment, knowingly did commit the offense of money laundering, in that the said MOHAMED HASSANAIN, and other persons whose identities are known and unknown to the Grand Jurors, did transport or possess property or did engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, including racketeering, distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, forgery, identity theft, money laundering, failure to file tax returns or reports, failure to pay gross income tax, with a value of \$500,000.00, or more, knowing that the transactions were designed in whole or in

part to conceal or disguise the nature, location, source, ownership or control of the property derived from the said criminal activity, and/or by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be derived from criminal activity, that is, the said MOHAMED HASSANAIN, and other persons whose identities are known and unknown to the Grand Jurors, did transport or possess U.S. currency, engage in banking and financial institution transactions, make payments and receive extensions of credit for the purchase and maintenance of real property and the purchase and/or lease of vehicles; including but not limited to the property listed in subparagraphs 3A-3Q; and 3T, as set forth in the Forfeiture Section of Count One of this Indictment, knowing the property that was transported or possessed was derived from criminal activity; that the transactions involving said property were designed in whole or in part with the intent to facilitate or promote the criminal activity, or to conceal or disguise the nature, location, source, ownership or control of the said property derived through criminal activity; or that direction, organization, financing, planning, managing, supervision, or control of the transportation of or transactions in said property was of property known 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 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

(Money Laundering - Second Degree)

IAN A. BURROWES

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants, between in or about July 2005, and in or about January 2007, at the City of East Orange, at the Township of Livingston, at the Township of Maplewood, at the City of Newark, and at the Township of West Orange, all in the County of Essex, at the Township of Hillside, and at the Township of Union, both in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, while engaged in the racketeering activity set forth in Count One of this Indictment, knowingly did commit the offense of money laundering, in that the said IAN BURROWES, and other persons whose identities are known and unknown to the Grand Jurors, did transport or possess property or did engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, including racketeering, distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, forgery, identity theft, money laundering, failure to file tax returns or reports, failure to pay gross income tax, with a value of at least \$75,000, knowing that the transactions were designed in whole or

in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the said criminal activity, and/or by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be derived from criminal activity, that is, the said IAN BURROWES, and other persons whose identities are known and unknown to the Grand Jurors, did transport or possess U.S. currency, engage in banking and financial institution transactions, make payments or receive extensions of credit for the purchase and maintenance of real property; including but not limited to the property listed in subparagraphs 30 and 3S, as set forth in the Forfeiture Section of Count One of this Indictment, knowing the property that was transported or possessed was derived from criminal activity; that the transactions involving said property were designed in whole or in part with the intent to facilitate or promote the criminal activity, or to conceal or disguise the nature, location, source, ownership or control of the said property derived through criminal activity; or that direction, organization, financing, planning, managing, supervision, or control of the transportation of or transactions in said property was of property known 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 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Money Laundering - Third Degree)

STEPHANIE MC LUCAS

between in or about July 2005, and in or about January 2007, at the City of East Orange, at the Township of Maplewood, at the City of Newark, and at the Township of West Orange, all in the County of Essex, elsewhere, and within the jurisdiction of this Court, while engaged in the racketeering activity set forth in Count One of this Indictment, did commit the offense of money laundering, in that the said STEPHANIE MC LUCAS knowingly did transport or possess property and/or did engage in transactions involving property known, or which a reasonable person would believe to be, derived from criminal activity, including racketeering, distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, forgery, identity theft, money laundering, failure to file tax returns or reports, failure to pay gross income tax, with a value less than \$75,000.00, by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be derived from criminal activity, that is, the said IAN BURROWES and STEPHANIE MC LUCAS did possess and transport U.S. currency knowing, or which a reasonable person would believe to be, was derived from criminal activity, including but not limited

to the property listed in subparagraphs 3R, as set forth in the Forfeiture Section of Count One of this Indictment, knowing the property that was transported or possessed was derived from criminal activity; that the transactions involving said property were designed in whole or in part with the intent to facilitate or promote the criminal activity, or to conceal or disguise the nature, location, source, ownership or control of the said property derived through criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b, 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

(Failure to File Tax Return - Third Degree)

MOHAMED HASSANAIN

between in or about 2005, and in or about 2007, at the Township of West Orange, in the County of Essex, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq], did fail to file a tax return required to be filed pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq], contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Failure to Pay Gross Income Tax - Third Degree)

MOHAMED HASSANAIN

between in or about 2005, and in or about 2007, at the Township of West Orange, in the County of Essex, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar years ending 2005 through and inclusive of 2006, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Failure to File Tax Return - Third Degree)

IAN A. BURROWES

between in or about 2005, and in or about 2007, at the Township of Union, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq], did fail to file a tax return required to be filed pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq], contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Failure to Pay Gross Income Tax - Third Degree)

IAN A. BURROWES

between in or about 2005, and in or about 2007, at the Township of Union, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar years ending 2005 through and inclusive of 2006, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Failure to File Tax Return - Third Degree)

STEPHANIE MC LUCAS

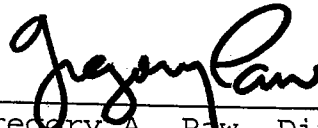
between in or about 2005, and in or about 2007, at the Township of Maplewood, in the County of Essex, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq], did fail to file a tax return required to be filed pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq], contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Failure to Pay Gross Income Tax - Third Degree)

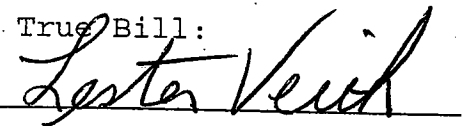
STEPHANIE MC LUCAS

between in or about 2005, and in or about 2007, at the Township of Maplewood, in the County of Essex, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar years ending 2005 through and inclusive of 2006, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, 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:



Acting Foreperson

Date: 1-2-07

**SUPERIOR COURT OF N.J.
FILED**

AUG 02 2007

Andrew J. Pata
Clerk

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL**

State Grand Jury

Number SGJ544-07-13

Superior Court

Docket Number 07-08-00104-S

STATE OF NEW JERSEY)

v.)

MOHAMED HASSANAIN)

a/k/a

"MOHAMED ALY")

AHMED ALY)

a/k/a

"FELIX")

WILLIAM S. LEONARD)

a/k/a

"OLD MAN WILL")

ORDER OF VENUE

WILL T. JORDON)

TERRY A. BROOKS)

TEREKE M. HAMMOND)

a/k/a

"BETTY LEE")

ENIN MARTIN)

WOODROW NEWTON)

a/k/a

"ALI")

STEPHANIE MC LUCAS)

a/k/a

"SARA")

JASON EDWIN ALLEN, JR.)

EDWIN POLANCO)

a/k/a

"GRANDE")

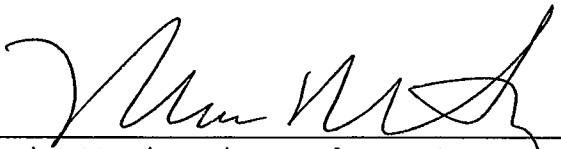
RAUL CRUZ)

IAN A. BURROWES)
AARON BRROWES)
RICK TERRELL)
TASHEEMAH N. TYSON)
 a/k/a)
 "SHEEMA")
KIMYATTA L. JONES)
JASHIMA BRICE)
 a/k/a)
 "JOYCE")
 and)
PATRICIA FUDGE)

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 *August*, 2007, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Essex 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 Essex for filing.



Maria Marinari Sypek, J.S.C.