

SUPERIOR COURT OF N.J.  
FILED

MAR 20 2007

*Marie J. Fitts*  
Clerk

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Docket Number SGJ537-07-4(1)

Superior Court

Docket Number 07-03-00022-S

STATE OF NEW JERSEY )

v. )

KYLE J. BUNN )  
also known as  
"SPUD" )

INDICTMENT

RONALD RASHEEM CROSLAND )

JAMAR LEVI DOGGETT )

JAENSEN HENSLEY )

and )

JOHN EDWARD-WESLEY WHITE, JR. )  
also known as  
"LITTLE JOHN" )

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

COUNT ONE

(Racketeering Conspiracy - Second Degree)

KYLE J. BUNN

RONALD RASHEEM CROSLAND

JAMAR LEVI DOGGETT

JAENSEN HENSLEY

and

JOHN EDWARD-WESLEY WHITE, JR.

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, at the times and places herein specified, with the purpose of promoting and facilitating the commission of the crime of racketeering, did commit the crime of conspiracy, that is, the defendants and the unindicted co-conspirators did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the crime of racketeering, and

B. One or more of them knowingly would aid in the planning, solicitation and commission of the crime of racketeering, that is, the defendants and one or more of the unindicted co-conspirators, being persons employed by or associated with an enterprise, which enterprise was engaged in and the activities of which affected trade or commerce, would conduct and 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, all as hereinafter described.

THE RELEVANT TIMES

1. The conspiracy occurred between in or about 2003, and in or about May 4, 2005.

THE RELEVANT PLACES

2. The conspiracy took place at the Township of

Hamilton, in the County of Atlantic; at the Township of Burlington, at the Township of Eastampton, at the Township of Evesham, at the Township of Florence, at the Township of Hainesport, at the Township of Mount Holly, at the Township of Pemberton, and at the Township of Willingboro, all in the County of Burlington; at the Borough of Lindenwold, at the Township of Pennsauken, and at the Borough of Runnemede, all in the County of Camden; at the City of Trenton, in the County of Mercer; elsewhere and within the jurisdiction of this Court.

#### THE ENTERPRISE

3. KYLE J. BUNN, RONALD RASHEEM CROSLAND, JAMAR LEVI DOGGETT, JAESEN HENSLEY, AND JOHN EDWARD-WESLEY WHITE, JR., and other persons whose identities are both known and unknown to the Grand Jurors, would constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact which would plan, solicit and commit the thefts, sales, alterations of the vehicle identification numbers and misrepresentations on motor vehicle titles of motorcycles and all-terrain vehicles.

#### THE PURPOSES OF THE ENTERPRISE

4. It was a part of the conspiracy that the purposes of the enterprise would include the theft and sale of motorcycles and all-terrain vehicles throughout central and southern New Jersey. The individual members of the enterprise described

herein would execute a common plan and scheme, acting in concert, by scouting desirable motorcycles and all-terrain vehicles, contacting other members to assist in the theft, and committing the theft with vans owned by a member or stolen for that purpose. The enterprise members would transact directly the motorcycle or all-terrain vehicle for cash, either splitting the proceeds or retaining another vehicle. Other enterprise members also would act as secondary fences, transacting the same motorcycles again for cash. It was a further purpose of the enterprise to take affirmative steps to thwart detection or apprehension by law enforcement, including the alteration of the vehicle identification numbers and misrepresentations on motor vehicle titles. Said conduct would be executed for the purpose of acquiring cash and other benefits for members and associates of the enterprise primarily in the following ways:

A. By engaging in repeated acts of theft by unlawful taking through a common scheme or course of conduct by unlawfully taking or exercising unlawful control over the movable property of others, that is, motorcycles and all-terrain vehicles, having a value in excess of \$500, with the purpose to deprive the owners thereof, in violation of N.J.S.A. 2C:20-3.

B. By engaging in repeated acts of receiving stolen property through a common scheme or course of conduct by knowingly receiving or bringing into this State movable property

of another, that is, motorcycles and all-terrain vehicles, having a value in excess of \$500, knowing the same to be stolen or believing that it was probably stolen, in violation of N.J.S.A. 2C:20-7.

C. By engaging in repeated acts of fencing through a common scheme or course of conduct by knowingly trafficking, initiating, organizing, planning, financing, directing, managing, or supervising the trafficking in stolen property, that is, motorcycles and all-terrain vehicles, having a value in excess of \$500, in violation of N.J.S.A. 2C:20-7.1.

D. By engaging in repeated acts of alteration of vehicle identification number through a common scheme or course of conduct by knowingly removing, defacing, altering, changing, destroying, covering or obliterating any trademark, distinguishing or identification number, serial number or mark on motorcycles and all-terrain vehicles, for an unlawful purpose, in violation of N.J.S.A. 2C:17-6.

E. By engaging in repeated acts of motor vehicle title offense through a common scheme or course of conduct by purposely or knowingly making a misrepresentation or false statement in title papers or other papers submitted to the Chief Administrator of the New Jersey Motor Vehicle Commission in connection therewith for motorcycles, in violation of N.J.S.A. 2C:21-4.8.

THE PATTERN OF RACKETEERING ACTIVITY

5. The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, would consist of at least two incidents of racketeering activity, including theft by unlawful taking (N.J.S.A. 2C:20-3), receiving stolen property (N.J.S.A. 2C:20-7), fencing (N.J.S.A. 2C:20-7.1), alteration of vehicle identification number (N.J.S.A. 2C:17-6), and motor vehicle title offense (N.J.S.A. 2C:21-4.8), all as described herein and in Counts Three through Thirty-Nine of this Indictment.

All in violation of N.J.S.A. 2C:41-2d and N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Racketeering - Second Degree)

KYLE J. BUNN

RONALD RASHEEM CROSLAND

JAMAR LEVI DOGETT

JAESSEN HENSLEY

and

JOHN EDWARD-WESLEY WHITE, JR.

and other individuals both known and unknown to the Grand Jurors, who are named as co-conspirators in this Indictment but not as defendants in this Count, between in or about 2003, and in or about May 4, 2005, at the Township of Hamilton, in the County of Atlantic; at the Township of Burlington, at the Township of Eastampton, at the Township of Evesham, at the Township of Florence, at the Township of Hainesport, at the Township of Mount Holly, at the Township of Pemberton, and at the Township of Willingboro, all in the County of Burlington; at the Borough of Lindenwold, at the Township of Pennsauken, and at the Borough of Runnemede, all in the County of Camden; at the City of Trenton, in the County of Mercer; elsewhere and within the jurisdiction of this Court, did commit the crime of racketeering, that is, the defendants and other persons employed by and associated with an enterprise engaged in and the activities of which affected trade and commerce, purposely and knowingly did conduct and participate

directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity.

#### The Enterprise

KYLE J. BUNN, RONALD RASHEEM CROSLAND, JAMAR LEVI DOGGETT, JAESEN HENSLEY and JOHN EDWARD-WESLEY WHITE, JR., and other persons whose identities are both known and unknown to the Grand Jurors, would constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact which would plan, solicit and commit the thefts, sales, alterations of the vehicle identification numbers and misrepresentations on motor vehicle titles of motorcycles and all-terrain vehicles. The purposes of the enterprise are set forth in Count One of this Indictment and incorporated herein as though fully set forth.

#### The Pattern of Racketeering Activity

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, did consist of at least two incidents of racketeering conduct, including theft by unlawful taking (N.J.S.A. 2C:20-3), receiving stolen property (N.J.S.A. 2C:20-7), fencing (N.J.S.A. 2C:20-7.1), alteration of vehicle identification number (N.J.S.A. 2C:17-6), and motor vehicle title offense (N.J.S.A. 2C:21-4.8), all as described herein and in Counts Three through Thirty-Nine of this Indictment.

KYLE J. BUNN



did commit the racketeering conduct of attempted theft by unlawful taking, theft by unlawful taking, receiving stolen property, fencing, alteration of vehicle identification number, and motor vehicle title offense, all of which is the subject of Counts 3, 4, 5, 6, 7, 8, 16, 18, 19, 22, and 32 of this Indictment, as well as other prior conduct.

RONALD RASHEEM CROSLAND

did commit the racketeering conduct of attempted theft by unlawful taking, theft by unlawful taking, and fencing, all of which is the subject of Counts 3, 4, 5, 9, 10, 11, 12, 13, 14, 15, and 17 of this Indictment, as well as other prior conduct.

JAMAR LEVI DOGETT

did commit the racketeering conduct of theft by unlawful taking, receiving stolen property, and fencing, all of which is the subject of Counts 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 32, and 35 of this Indictment, as well as other prior conduct.

JAESSEN HENSLEY

did commit the racketeering conduct of receiving stolen property, fencing, alteration of vehicle identification number, and motor vehicle title offense, all of which is the subject of Counts 33, 34, 36, 37, 38, and 39 of this Indictment, as well as other prior conduct.

JOHN EDWARD-WESLEY WHITE, JR.

did commit the racketeering conduct of theft by unlawful taking,

receiving stolen property, attempted fencing, alteration of vehicle identification number, and motor vehicle title offense, all of which is the subject of Counts 26, 28, 29, 30, and 31 of this Indictment, as well as other prior conduct.

All in violation of N.J.S.A. 2C:41-2c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

#### FORFEITURES

1. All allegations of Count One of this Indictment 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, acquired and maintained in violation of N.J.S.A. 2C:41-2c, and

B. Interests in the enterprise specified herein, which the said defendants established, acquired, maintained, operated, controlled, conducted, and participated in the conduct of, in violation of N.J.S.A. 2C:41-2c.

3. The said interests, all subject to forfeiture to the State of New Jersey, include, but are not limited to, the following:

A. 1995 Plymouth Voyager PZL91L  
VIN 2P4GH55R8SR210183

Registered: Kyle Bunn

B. 1998 Ford van NKP33B  
VIN 1FTDE14YXKHA93008  
Registered: John White

COUNT THREE

(Attempted Theft by Unlawful Taking - Third Degree)

KYLE J. BUNN

and

RONALD RASHEEM CROSLAND

on or about May 13, 2004, at the Township of Pennsauken, in the County of Camden, elsewhere and within the jurisdiction of this Court, did purposely attempt to unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said KYLE J. BUNN and RONALD RASHEEM CROSLAND did purposely attempt to unlawfully take or exercise unlawful control over one 1999 Honda CBR 600 motorcycle, Vehicle Identification Number JH2PC3502XM000088, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, 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 FOUR

(Theft by Unlawful Taking - Third Degree)

KYLE J. BUNN

and

RONALD RASHEEM CROSLAND

on or about December 6, 2003, at the Township of Evesham, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said KYLE J. BUNN and RONALD RASHEEM CROSLAND did unlawfully take or exercise unlawful control over one 2003 Yamaha R6 motorcycle, Vehicle Identification Number JYARJ06E73A005598, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Fencing - Third Degree)

KYLE J. BUNN

and

RONALD RASHEEM CROSLAND

between on or about December 6, 2003, and on or about December 15, 2003, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said KYLE J. BUNN and RONALD RASHEEM CROSLAND did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2003 Yamaha R6 motorcycle, Vehicle Identification Number JYARJ06E73A005598, in excess of \$500.00, reported stolen on December 6, 2003, to the Evesham Township Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Alteration of Vehicle Identification Number - Third Degree)

KYLE J. BUNN

between on or about December 6, 2003, and on or about December 15, 2003, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly remove, deface, alter, change, destroy, cover or obliterate any trademark, distinguishing or identification number, serial number or mark on or from any motor vehicle for an unlawful purpose; that is, the said KYLE J. BUNN did knowingly alter the Vehicle Identification Number on one 2003 Yamaha R6 motorcycle, from JYARJ06E73A005598 to JYARJ04E11A017083, for the unlawful purpose of concealing the theft of that motorcycle, contrary to the provisions of N.J.S.A. 2C:17-6a, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Motor Vehicle Title Offense - Third Degree)

KYLE J. BUNN

on or about December 15, 2003, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did purposely or knowingly misrepresent a number placed on a motor vehicle by the manufacturer, or in any other manner misrepresent the description of a motor vehicle in a title paper; that is, the said KYLE J. BUNN, did purposely or knowingly misrepresent one 2003 Yamaha R6 motorcycle, Vehicle Identification Number JYARJ06E73A005598, as a 2001 Yamaha R6 motorcycle, Vehicle Identification Number JYARJ04E11A017083, in a title paper, contrary to the provisions of N.J.S.A. 2C:21-4.8, and against the peace of this State, the government and dignity of the same.



COUNT EIGHT

(Alteration of Vehicle Identification Number - Third Degree)

KYLE J. BUNN

on or about April 25, 2005, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly remove, deface, alter, change, destroy, cover or obliterate any trademark, distinguishing or identification number, serial number or mark on or from any motor vehicle for an unlawful purpose; that is, the said KYLE J. BUNN did knowingly alter the Vehicle Identification Number on one 2004 Kawasaki ZX 636 motorcycle, from JKBZXJB144A029215 to JKAZX4J112A051340, for the unlawful purpose of concealing the theft of that motorcycle, contrary to the provisions of N.J.S.A. 2C:17-6a, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Fencing - Third Degree)

RONALD RASHEEM CROSLAND

on or about June 1, 2004, at the Township of Pennsauken, in the County of Camden, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said RONALD RASHEEM CROSLAND did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2003 Honda CBR 600RR motorcycle, Vehicle Identification Number JH2PC37063M004300, in excess of \$500.00, reported stolen on December 13, 2003, to the Hammonton Township Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Theft by Unlawful Taking - Third Degree)

RONALD RASHEEM CROSLAND

on or about June 7, 2004, at the Township of Hamilton, in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said RONALD RASHEEM CROSLAND did unlawfully take or exercise unlawful control over one 2003 Honda CBR 600RR motorcycle, Vehicle Identification Number JH2PC37013M007802, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Fencing - Third Degree)

RONALD RASHEEM CROSLAND

between on or about June 3, 2004, and on or about June 7, 2004, at the Township of Pennsauken, in the County of Camden, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said RONALD RASHEEM CROSLAND did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2003 Honda CBR 600RR motorcycle, Vehicle Identification Number JH2PC37013M007802, in excess of \$500.00, reported stolen on June 7, 2004, to the Hamilton Township Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Theft by Unlawful Taking - Third Degree)

RONALD RASHEEM CROSLAND

on or about June 7, 2004, at the Township of Hamilton, in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said RONALD RASHEEM CROSLAND did unlawfully take or exercise unlawful control over one 2003 Honda CBR 600RR motorcycle, Vehicle Identification Number JH2PC37043M008491, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Fencing - Third Degree)

RONALD RASHEEM CROSLAND

between on or about June 3, 2004, and on or about June 7, 2004, at the Township of Pennsauken, in the County of Camden, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said RONALD RASHEEM CROSLAND did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2003 Honda CBR 600RR motorcycle, Vehicle Identification Number JH2PC37043M008491, in excess of \$500.00, reported stolen on June 7, 2004, to the Hamilton Township Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Theft by Unlawful Taking - Third Degree)

RONALD RASHEEM CROSLAND

on or about June 7, 2004, at the Township of Hainesport, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said RONALD RASHEEM CROSLAND did unlawfully take or exercise unlawful control over one 1997 Dodge van, Vehicle Identification Number 2B5WB35Z3VK563930, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Theft by Unlawful Taking - Third Degree)

RONALD RASHEEM CROSLAND

on or about June 7, 2004, at the Borough of Runnemede, in the County of Camden, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said RONALD RASHEEM CROSLAND did unlawfully take or exercise unlawful control over one 2004 Honda CBR 600RR motorcycle, Vehicle Identification Number JH2PC37034M102959, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT SIXTEEN

(Alteration of Vehicle Identification Number - Third Degree)

KYLE J. BUNN

between on or about June 7, 2004, and on or about July 27, 2004, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly remove, deface, alter, change, destroy, cover or obliterate any trademark, distinguishing or identification number, serial number or mark on or from any motor vehicle for an unlawful purpose; that is, the said KYLE J. BUNN did knowingly alter the Vehicle Identification Number on one 2004 Honda CBR 600RR motorcycle, from JH2PC37034M102959 to JH2PC37013M005421, for the unlawful purpose of concealing the theft of that motorcycle, contrary to the provisions of N.J.S.A. 2C:17-6a, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Fencing - Third Degree)

RONALD RASHEEM CROSLAND

between on or about February 16, 2005, and on or about February 17, 2005, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said RONALD RASHEEM CROSLAND did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2000 Yamaha R6 motorcycle, Vehicle Identification Number JYARJ04E2YA009570, in excess of \$500.00, reported stolen on August 13, 2000, to the Florence Township Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Theft by Unlawful Taking - Third Degree)

KYLE J. BUNN

and

JAMAR LEVI DOGETT

on or about April 26, 2005, at the Township of Eastampton, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said KYLE J. BUNN and JAMAR LEVI DOGETT did unlawfully take or exercise unlawful control over one 2005 Honda CBR 1000RR motorcycle, Vehicle Identification Number JH2SC57005M100495, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Fencing - Third Degree)

KYLE J. BUNN

and

JAMAR LEVI DOGGETT

between on or about April 25, 2005, and on or about April 26, 2005, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said KYLE J. BUNN and JAMAR LEVI DOGGETT did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2005 Honda CBR 1000RR motorcycle, Vehicle Identification Number JH2SC57005M100495, in excess of \$500.00, reported stolen on April 26, 2005, to the Eastampton Township Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Theft by Unlawful Taking - Third Degree)

JAMAR LEVI DOGETT

on or about March 18, 2004, at the Township of Florence, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said JAMAR LEVI DOGETT did unlawfully take or exercise unlawful control over one 2002 Yamaha YFM 350X Warrior all terrain vehicle, Vehicle Identification Number JY43GD0382C0222990, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Fencing - Third Degree)

JAMAR LEVI DOGGETT

on or about March 19, 2004, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said JAMAR LEVI DOGGETT did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2002 Yamaha YFM 350X Warrior all terrain vehicle, Vehicle Identification Number JY43GD0382C0222990, in excess of \$500.00, reported stolen on March 18, 2004, to the Florence Township Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Receiving Stolen Property - Third Degree)

KYLE J. BUNN

and

JAMAR LEVI DOGGETT

between on or about March 4, 2004, and on or about March 19, 2004, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly receive or bring into this State movable property of another, in excess of \$500.00, knowing that it had been stolen or believing that it was probably stolen; that is, the said KYLE J. BUNN and JAMAR LEVI DOGGETT did knowingly receive or bring into this State one 2003 Honda CBR 600 F4i motorcycle, Vehicle Identification Number JH2PC35093M402281, in excess of \$500.00, knowing it had been stolen or believing that it was probably stolen, contrary to the provisions of N.J.S.A. 2C:20-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Fencing - Third Degree)

JAMAR LEVI DOGGETT

on or about March 19, 2004, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said JAMAR LEVI DOGGETT did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2003 Honda CBR 600 F4i motorcycle, Vehicle Identification Number JH2PC35093M402281, in excess of \$500.00, reported stolen on March 4, 2004, to the Baltimore County (Maryland) Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT TWENTY-FOUR

(Theft by Unlawful Taking - Third Degree)

JAMAR LEVI DOGGETT

on or about October 29, 2004, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said JAMAR LEVI DOGGETT did unlawfully take or exercise unlawful control over one 2000 Yamaha R6 motorcycle, Vehicle Identification Number JYARN05E6YA003290, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Fencing - Third Degree)

JAMAR LEVI DOGGETT

on or about November 4, 2004, at the Township of Burlington, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said JAMAR LEVI DOGGETT did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2000 Yamaha R6 motorcycle, Vehicle Identification Number JYARN05E6YA003290, in excess of \$500.00, reported stolen on October 29, 2004, to the Trenton City Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Theft by Unlawful Taking - Third Degree)

JAMAR LEVI DOGGETT

and

JOHN EDWARD-WESLEY WHITE, JR.

on or about October 9, 2004, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said JAMAR LEVI DOGGETT and JOHN EDWARD-WESLEY WHITE, JR. did unlawfully take or exercise unlawful control over one 2003 Kawasaki ZX12 motorcycle, Vehicle Identification Number JKAZX9B133A009734, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Fencing - Third Degree)

JAMAR LEVI DOGGETT

between on or about October 9, 2004, and on or about February 28, 2005, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said JAMAR LEVI DOGGETT did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2003 Kawasaki ZX12 motorcycle, Vehicle Identification Number JKAZX9B133A009734, in excess of \$500.00, reported stolen on October 9, 2004, to the Trenton City Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Receiving Stolen Property - Third Degree)

JOHN EDWARD-WESLEY WHITE, JR.

between on or about August 18, 2002, and on or about May 4, 2005, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly receive or bring into this State movable property of another, in excess of \$500.00, knowing that it had been stolen or believing that it was probably stolen; that is, the said JOHN EDWARD-WESLEY WHITE, JR. did knowingly receive or bring into this State one 2002 Honda CBR 600 F4i motorcycle, Vehicle Identification Number JH2PC35072M302307, in excess of \$500.00, knowing it had been stolen or believing that it was probably stolen, contrary to the provisions of N.J.S.A. 2C:20-7, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Attempted Fencing - Third Degree)

JOHN EDWARD-WESLEY WHITE, JR.

between on or about October 15, 2004, and on or about November 15, 2004, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did purposely attempt to knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said JOHN EDWARD-WESLEY WHITE, JR. did purposely attempt to knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2002 Honda CBR F4i 600 motorcycle, Vehicle Identification Number JH2PC35072M302307, in excess of \$500.00, reported stolen on August 18, 2002, to the Maple Shade Township Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Alteration of Vehicle Identification Number - Third Degree)

JOHN EDWARD-WESLEY WHITE, JR.

between on or about August 18, 2002, and on or about May 4, 2005, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly possess any motor vehicle, or any of the parts thereof, from or on which any trademark, distinguishing or identification number, serial number or mark has been removed, defaced, altered, changed, destroyed, covered or obliterated for an unlawful purpose; that is, the said JOHN EDWARD-WESLEY WHITE, JR. did knowingly possess one 2002 Honda CBR F4i 600 motorcycle with the Vehicle Identification Number altered from JH2PC35072M302307 to JH2PC35011M206719, for the unlawful purpose of concealing the theft of that motorcycle, contrary to the provisions of N.J.S.A. 2C:17-6b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Motor Vehicle Title Offense - Third Degree)

JOHN EDWARD-WESLEY WHITE, JR.

on or about October 1, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did purposely or knowingly misrepresent a number placed on a motor vehicle by the manufacturer, or in any other manner misrepresent the description of a motor vehicle in a title paper; that is, the said JOHN EDWARD-WESLEY WHITE, JR., did purposely or knowingly misrepresent one 2002 Honda CBR F4i 600 motorcycle, Vehicle Identification Number JH2PC35072M302307, as a 2001 Honda CBR F4i 600 motorcycle, Vehicle Identification Number JH2PC35011M206719, in a title paper, contrary to the provisions of N.J.S.A. 2C:21-4.8, and against the peace of this State, the government and dignity of the same.



COUNT THIRTY-TWO

(Theft by Unlawful Taking - Third Degree)

KYLE J. BUNN

and

JAMAR LEVI DOGETT

on or about March 3, 2004, at the Borough of Lindenwold, in the County of Camden, elsewhere and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of another in excess of \$500.00 with purpose to deprive the owner thereof; that is, the said KYLE J. BUNN and JAMAR LEVI DOGETT did unlawfully take or exercise unlawful control over one 1997 Suzuki GSXR 750 motorcycle, Vehicle Identification Number JS1GR7DA2100927, in excess of \$500.00, with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Fencing - Third Degree)

JAESSEN HENSLEY

on or about March 9, 2005, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said JAESSEN HENSLEY did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 1997 Suzuki GSXR 750 motorcycle, Vehicle Identification Number JS1GR7DA2100927, in excess of \$500.00, reported stolen on March 3, 2004, to the Lindenwold Township Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Alteration of Vehicle Identification Number - Third Degree)

JAESSEN HENSLEY

between on or about March 3, 2004, and on or about November 30, 2004, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly remove, deface, alter, change, destroy, cover or obliterate any trademark, distinguishing or identification number, serial number or mark on or from any motor vehicle for an unlawful purpose; that is, the said JAESSEN HENSLEY did knowingly alter the Vehicle Identification Number on one 1997 Suzuki GSXR 750 motorcycle, Vehicle Identification Number JS1GR7DA2100927 to JS1GN78A8W2101901, for the unlawful purpose of concealing the theft of that motorcycle, contrary to the provisions of N.J.S.A. 2C:17-6a, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Receiving Stolen Property - Third Degree)

JAMAR LEVI DOGGETT

between on or about December 17, 2001, and on or about September 1, 2004, at the Township of Willingboro, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly receive or bring into this State movable property of another, in excess of \$500.00, knowing that it had been stolen or believing that it was probably stolen; that is, the said JAMAR LEVI DOGGETT did knowingly receive or bring into this State one 2000 Honda CBR 929 motorcycle, Vehicle Identification Number JH2SC4401YM002689, in excess of \$500.00, knowing it had been stolen or believing that it was probably stolen, contrary to the provisions of N.J.S.A. 2C:20-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Fencing - Third Degree)

JAESSEN HENSLEY

on or about April 28, 2005, at the Township of Pemberton, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property in excess of \$500.00; that is, the said JAESSEN HENSLEY did knowingly traffic in, or initiate, organize, plan, finance, direct, manage, or supervise trafficking in one 2000 Honda CBR 929 motorcycle, Vehicle Identification Number JH2SC4401YM002689, in excess of \$500.00, reported stolen on December 17, 2001, to the Westtown/East Goshen Township (Pennsylvania) Police Department, contrary to the provisions of N.J.S.A. 2C:20-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SEVEN

(Alteration of Vehicle Identification Number - Third Degree)

JAENSEN HENSLEY

between on or about December 17, 2001, and on or about September 1, 2004, at the Township of Pemberton, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly remove, deface, alter, change, destroy, cover or obliterate any trademark, distinguishing or identification number, serial number or mark on or from any motor vehicle for an unlawful purpose; that is, the said JAENSEN HENSLEY did knowingly alter the Vehicle Identification Number on one 2000 Honda CBR 929 motorcycle from JH2SC4401YM002689 to JH2SC4409YM003363, for the unlawful purpose of concealing the theft of that motorcycle, contrary to the provisions of N.J.S.A. 2C:17-6a, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-EIGHT

(Motor Vehicle Title Offense - Third Degree)

JAESEN HENSLEY

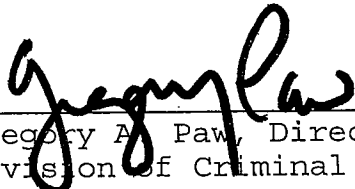
on or about September 1, 2004, at the Township of Mount Holly, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did purposely or knowingly misrepresent a number placed on a motor vehicle by the manufacturer, or in any other manner misrepresent the description of a motor vehicle in a title paper; that is, the said JAESEN HENSLEY did purposely or knowingly misrepresent one 2000 Honda CBR 929 motorcycle, Vehicle Identification Number JH2SC4401YM002689, as a 2000 Honda CBR 900 JH2SC4409YM003363, in a title paper, contrary to the provisions of N.J.S.A. 2C:21-4.8, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Receiving Stolen Property - Third Degree)

JAESSEN HENSLEY

between on or about December 8, 2004, at the Township of Pemberton, all in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly receive or bring into this State movable property of another, in excess of \$500, knowing that it had been stolen or believing that it was probably stolen; that is, the said JAESEN HENSLEY did knowingly receive or bring into this State a 2004 BMW X5, Vehicle Identification Number 5UXFB53524LV00558, in excess of \$500, knowing it had been stolen or believing that it was probably stolen, contrary to the provisions of N.J.S.A. 2C:20-7, 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

Date: 3/20/07



SUPERIOR COURT OF N.J.  
FILED

MAR 20 2007

*Handwritten signature*  
Clerk

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ537-07-4(1)

Superior Court  
Docket Number

07-03-00022-S

STATE OF NEW JERSEY )

v. )

KYLE J. BUNN )  
also known as )  
"SPUD" )

RONALD RASHEEM CROSLAND )

JAMAR LEVI DOGGETT )

JAESSEN HENSLEY )

and )

JOHN EDWARD-WESLEY WHITE, JR. )  
also known as )  
"LITTLE JOHN" )

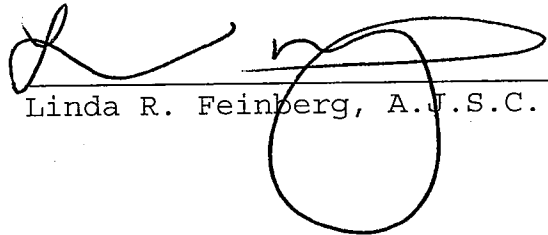
ORDER OF VENUE

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

IT IS ORDERED on this *20th* day of *March*, 2007,  
pursuant to paragraph 8 of the State Grand Jury Act, that the  
County of Burlington 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 Burlington for filing.



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