

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL PART
MERCER COUNTY
ACCUSATION No 07-06-651A

STATE OF NEW JERSEY

v.

REGINALD JACKSON

CRIMINAL ACTION
ACCUSATION

Reginald Jackson, being charged upon oath with one count of Racketeering - First Degree contrary to N.J.S.A. 2C:41-2d and one count of Unlawful Possession of a Weapon contrary to N.J.S.A. 2C:39-5 and having in writing waived indictment and trial by jury and having requested to be tried before this Court, and said request having been granted;

The State of New Jersey, through the Attorney General, Deputy

A. Conrad appearing, alleges that:

COUNT ONE

(Racketeering - First Degree)

REGINALD JACKSON

DONALD F. PHILAN
CLERK OF SUPERIOR COURT
SUPERIOR COURT OF N.J.
MERCER COUNTY
RECEIVED AND FILED

JUN 18 2007

Sue Regan
SUE REGAN
DEPUTY CLERK OF SUPERIOR COURT

and other persons whose identities are known and unknown to the State, who are named as co-conspirators and members of the criminal enterprise but not as defendants herein and other individuals whose identities are known to the State, who at times relevant to this accusation were acting at the direction of the New Jersey State Police, at the times and places herein specified, did commit the crime of Racketeering, that is, the defendant and the co-conspirators, being

individuals employed by and associated with an enterprise engaged in and the activities of which affected trade and commerce in the State of New Jersey with the purpose of promoting or facilitating the racketeering enterprise did agree that:

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

B. One or more of them would aid in the planning, solicitation or commission of the crime of racketeering, that is, to conduct, participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, affairs through a pattern of racketeering activity or collection of an unlawful debt, including the commission of crimes of violence, crimes of the first degree, or crimes involving the use of firearms, all as hereinafter described in violation of N.J.S.A. 2C:41-2d, N.J.S.A. 2C: 41-2c all as hereinafter described.

THE RELEVANT TIMES

1. The predicate criminal activity occurred between on or about February 1, 2006 and on or about February 1, 2007.

THE RELEVANT PLACES

The conspiracy took place at the City of Trenton, in the County of Mercer; at Township of Woodbridge in the County of Middlesex; in the Township of Morrisville, in the Count of Bucks, in the State of Pennsylvania, elsewhere and within the jurisdiction of this Court.

THE ENTERPRISE

ANTONIO MERRITT, BOBBY WILLIAMS, FELICITA GEE,
ANTWON YEAGER, QUASSAN BETHEA, CALVIN LITTLE, KHALIFINI RICHARDSON,
REGINALD JACKSON, MICHAEL DAVIS, RAYSHAWN MCNAIR, RONELL DIXON,

[REDACTED] [REDACTED] [REDACTED]

BOBBY DAVIS JR., JAMES EDENS, OLIVER HARRIS, BAYSHAWN NELSON, CAPITAL WELLONS, SHAWN DAVIS, QUASSIM HALLET, ANTOINE TAYLOR and other persons whose identities are known and unknown to the Grand Jurors, 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 were known as a sect of the blood gang, "Sex Money Murder", or associates thereof although not a legal entity.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, consisted of at least two incidents of racketeering activity, including Murder (N.J.S.A. 2C:11-3), (Money Laundering (N.J.S.A. 2C:21-25), Unlawful Manufacture, Purchase, Use or Transfer of Firearms (N.J.S.A. 2C:39-1 et seq.), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Employing a Juvenile in a Drug Distribution Scheme (N.J.S.A. 2C:35-6), Controlled Dangerous Substances Near or On School Property (N.J.S.A. 2C:35-7), Distributing, Dispensing or Possessing Controlled Dangerous Substances Within 500 Feet of Certain Public Property (N.J.S.A. 2C:35-7.1), or conspiracies to commit these crimes.

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

COUNT TWO

(Unlawful Possession of a Weapon- Third Degree)

REGINALD JACKSON

on or about October 31, 2006, in the City of Trenton, in the County of Mercer elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, that is a .32 caliber revolver bearing serial number 38897, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same. W-2006-7575-1111



Debra A. Conrad
Deputy Attorney General
Division of Criminal Justice

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL PART
MERCER COUNTY
ACCUSATION No

07-06-0648 (A)

STATE OF NEW JERSEY

v.

QUASSAN BETHEA

CRIMINAL ACTION
ACCUSATION

QUASSAN BETHEA, being charged upon oath with one count of Racketeering - First Degree contrary to N.J.S.A. 2C:41-2c, N.J.S.A. 2C:41-2d and having in writing waived indictment and trial by jury and having requested to be tried before this Court, and said request having been granted;

The State of New Jersey, through the Attorney General, Deputy Attorney General Debra A. Conrad appearing, alleges that:

COUNT ONE

(Racketeering - First Degree)

QUASSAN BETHEA

and other persons whose identities are known and unknown to the State, who are named as co-conspirators and members of the criminal enterprise but not as defendants herein and other individuals whose identities are known to the State, who at times relevant to this accusation were acting at the direction of the New Jersey State Police, at the times and places herein specified, did commit the crime of Racketeering, that is, the defendant and the co-conspirators, being

[REDACTED] [REDACTED] [REDACTED]

individuals employed by and associated with an enterprise engaged in and the activities of which affected trade and commerce in the State of New Jersey with the purpose of promoting or facilitating the racketeering enterprise did agree that:

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

B. One or more of them would aid in the planning, solicitation or commission of the crime of racketeering, that is, to conduct, participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, affairs through a pattern of racketeering activity or collection of an unlawful debt, including the commission of crimes of violence, crimes of the first degree, or crimes involving the use of firearms, all as hereinafter described in violation of . N.J.S.A. 2C:41-2d, N.J.S.A. 2C: 41-2c all as hereinafter described.

THE RELEVANT TIMES

1. The predicate criminal activity occurred between on or about February 1, 2004 and on or about February 1, 2007.

THE RELEVANT PLACES

The conspiracy took place at the City of Trenton, in the County of Mercer; at Township of Woodbridge in the County of Middlesex; in the Township of Morrisville, in the Count of Bucks, in the State of Pennsylvania, elsewhere and within the jurisdiction of this Court.

THE ENTERPRISE

ANTONIO MERRITT, BOBBY WILLIAMS, FELICITA GEE,
ANTWON YEAGER, QUASSAN BETHEA, CALVIN LITTLE, KHALIFINI RICHARDSON,
REGINALD JACKSON, MICHAEL DAVIS, RAYSHAWN MCNAIR, RONELL DIXON,

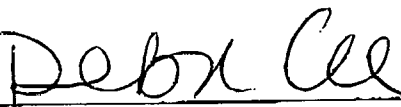
[REDACTED] [REDACTED] [REDACTED]

BOBBY DAVIS JR., JAMES EDENS, OLIVER HARRIS, BAYSHAWN NELSON, CAPITAL WELLONS, SHAWN DAVIS, QUASSIM HALLET, ANTOINE TAYLOR and other persons whose identities are known and unknown to the Grand Jurors, 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 were known as a sect of the blood gang, "Sex Money Murder", or associates thereof although not a legal entity.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, consisted of at least two incidents of racketeering activity, including (Money Laundering (N.J.S.A. 2C:21-25), Unlawful Manufacture, Purchase, Use or Transfer of Firearms (N.J.S.A. 2C:39-1 et seq.), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Employing a Juvenile in a Drug Distribution Scheme (N.J.S.A. 2C:35-6), Controlled Dangerous Substances Near or On School Property (N.J.S.A. 2C:35-7), Distributing, Dispensing or Possessing Controlled Dangerous Substances Within 500 Feet of Certain Public Property (N.J.S.A. 2C:35-7.1), or conspiracies to commit these crimes.

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



Debra A. Conrad
Deputy Attorney General
Division of Criminal Justice

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL PART
MERCER COUNTY
ACCUSATION No

07-66-0650A

STATE OF NEW JERSEY

v.

RONEL DIXON

CRIMINAL ACTION
ACCUSATION

Ronel Dixon, being charged upon oath with one count of Racketeering - Second Degree contrary to N.J.S.A. 2C:41-2d and one count of Conspiracy to Distribute a Controlled Dangerous Substance contrary to N.J.S.A. 2C:5-2/2C:35-5 and having in writing waived indictment and trial by jury and having requested to be tried before this Court, and said request having been granted;

The State of New Jersey, through the Attorney General, Deputy Attorney General Debra

A. Conrad appearing, alleges that:

COUNT ONE

(Racketeering - Second Degree)

Ronel Dixon

and other persons whose identities are known and unknown to the State, who are named as co-conspirators and members of the criminal enterprise but not as defendants herein and other individuals whose identities are known to the State, who at times relevant to this accusation were acting at the direction of the New Jersey State Police, at the times and places herein specified,

did commit the crime of Racketeering, that is, the defendant and the co-conspirators, being individuals employed by and associated with an enterprise engaged in and the activities of which affected trade and commerce in the State of New Jersey with the purpose of promoting or facilitating the racketeering enterprise did agree that:

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

B. One or more of them would aid in the planning, solicitation or commission of the crime of racketeering, that is, to conduct, participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, affairs through a pattern of racketeering activity all as hereinafter described in violation of N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES

1. The predicate criminal activity occurred between on or about February 1, 2006 and on or about February 1, 2007.

THE RELEVANT PLACES

The conspiracy took place at the City of Trenton, in the County of Mercer; at Township of Woodbridge in the County of Middlesex; in the Township of Morrisville, in the County of Bucks, in the State of Pennsylvania, elsewhere and within the jurisdiction of this Court.

THE ENTERPRISE

ANTONIO MERRITT, BOBBY WILLIAMS, FELICITA GEE, ANTWON YEAGER,

QUASSAN BETHEA, CALVIN LITTLE, KHALIFINI RICHARDSON, REGINALD JACKSON, MICHAEL DAVIS, RAYSHAWN MCNAIR, RONELL DIXON, BOBBY DAVIS JR., JAMES EDENS, OLIVER HARRIS, BAYSHAWN NELSON, CAPITAL WELLONS, SHAWN DAVIS, QUASSIM HALLET, ANTOINE TAYLOR and other persons whose identities are known and unknown to the Grand Jurors, 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 were known as a sect of the blood gang, "Sex Money Murder", or associates thereof although not a legal entity.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, consisted of at least two incidents of racketeering activity, including Murder (N.J.S.A. 2C:11-3), (Money Laundering (N.J.S.A. 2C:21-25), Unlawful Manufacture, Purchase, Use or Transfer of Firearms (N.J.S.A. 2C:39-1 et seq.), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Employing a Juvenile in a Drug Distribution Scheme (N.J.S.A. 2C:35-6), Controlled Dangerous Substances Near or On School Property (N.J.S.A. 2C:35-7), Distributing, Dispensing or Possessing Controlled Dangerous Substances Within 500 Feet of Certain Public Property (N.J.S.A. 2C:35-7.1), or conspiracies to commit these crimes.

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

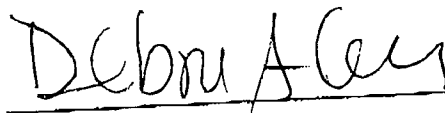
COUNT TWO

(Distribution of CDS - Second Degree)

[REDACTED] [REDACTED] [REDACTED]

Ronel Dixon

and other persons whose identities are known and unknown to the State, who are named as co-conspirators but not as defendants herein and other individuals whose identities are known to the State, who at times relevant to this accusation were acting at the direction of the New Jersey State Police on or about October 12, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute Cocaine, a Schedule II controlled dangerous substance, in a quantity of one-half ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Debra A. Conrad
Deputy Attorney General
Division of Criminal Justice