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**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ584-10-10

Superior Court

Docket Number 10-04-00031-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

DEMOND CONLEY)

TERRENCE SIMONSON)

DEMETRIUS ROSS)

JOSEF ALLEN)

KELLI COLEMAN)

and)

"JOHN DOE")

also known as)

"J.P.")

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

COUNT ONE

(Leader of Auto Theft Trafficking Network - Second Degree)

DEMOND CONLEY

between on or about August 11, 2009, and on or about November 10,
2009, at the City of Irvington and at the City of Newark, both in
the County of Essex, at the City of Jersey City, in the County of
Hudson, at the Township of Burlington and at the Township of

Willingboro, both in the County of Burlington, at the City of New York in the State of New York, at the Township of Parsippany Troy-Hills and at the Township of Boonton, both in the County of Morris, at the Township of Bedminster, in the County of Somerset, at the Township of Middletown, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, did conspire with others as an organizer, supervisor, financier or manager, to engage for profit in a scheme or course of conduct to unlawfully take, dispose of, distribute, bring into or transport in this State automobiles as stolen property; that is, the said DEMOND CONLEY did conspire with others as an organizer, supervisor, financier or manager, to engage for profit in a scheme or course of conduct to unlawfully distribute, bring into or transport automobiles in the State of New Jersey as stolen property, contrary to the provisions of N.J.S.A. 2C:20-18, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Fencing - Third Degree)

DEMOND CONLEY

and

"J.P."

who are named as defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, between on or about August 7, 2009, and on or about August 11, 2009, at the City of Irvington, in the County of Essex, at the City of Newark, in the County of Essex, at the Township of Burlington and at the Township of Willingboro, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property valued in excess of \$500, that is, the said DEMOND CONLEY and "J.P.", did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property, namely, a black 2007 Kawasaki motorcycle, last six numbers of the VIN 028132, belonging to M.L. of Burlington, New Jersey, valued at approximately \$5000; a blue 2002 Suzuki GSX motorcycle, last six numbers of the VIN 103482, belonging to K.C. of Eastampton, New Jersey, valued at approximately \$4000; a beige 1999 Dodge Grand Caravan, last six numbers of VIN 212757, belonging to L.D.

of Burlington, New Jersey, valued at approximately \$2000; and a tan 1999 Plymouth Voyager, last six numbers of the VIN 922691, belonging to G.H. of Willingboro, New Jersey, valued at approximately \$2000; knowing the same to have been stolen or believing that they had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7.1(b) and N.J.S.A. 2C: 2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Fencing - Second Degree)

DEMOND CONLEY

who is named as a defendant herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, on or about September 10, 2009, at the City of Irvington, in the County of Essex, at the City of Newark, in the County of Essex, at the City of New York, in the State of New York, elsewhere, and within the jurisdiction of this Court, did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property valued in excess of \$75,000, that is, the said DEMOND CONLEY did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property, namely, a black 2008 BMW 750 Alpina, last six numbers of the VIN T10960, belonging to S.W. of New York City, New York, valued at approximately \$105,000, knowing the same to have been stolen or believing that it had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7.1(b) and N.J.S.A. 2C: 2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Conspiracy - Third Degree)

DEMOND CONLEY

JOSEF ALLEN

and

KELLI COLEMAN

between on or about September 15, 2009 and on or about October 21, 2009, at the City of Irvington and at the City of Newark, both in the County of Essex, at the Township of Mount Laurel in the County of Burlington, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting and facilitating the commission of the crimes of insurance fraud, receiving stolen property, and fencing did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or

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

1. Knowingly did receive or bring into this State movable property of another, knowing that the property had been stolen or believing that it had probably been stolen and valued in an aggregate amount in excess of \$500, contrary to the provisions of N.J.S.A. 2C:20-7.

2. Knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property valued in excess of \$500, contrary to the provisions of N.J.S.A. 2C:20-7.1(b).

3. Knowingly did file a false insurance claim that alleged that a silver 2007 Cadillac Escalade had been stolen on September 16, 2009, when in fact it had been sold to an undercover law enforcement officer on September 15, 2009, contrary to the provisions of N.J.S.A. 2C:21-4.6.

The Grand Jurors aforesaid, upon their oaths, do further present that pursuant to the aforesaid conspiracy, the following overt acts, among others, were committed:

OVERT ACTS

1. On or about September 15, 2009, at the City of Irvington and at the City of Newark, both in the County of Essex, the said Demond Conley did knowingly traffic in, organize, plan, finance, direct, manage or supervise trafficking in stolen property valued in excess of \$500, that is he made arrangements for and sold the stolen property of K.C. of Newark and the Keystone Insurance Company/Mid-Atlantic AAA of Mount Laurel New Jersey, namely, a silver 2007 Cadillac Escalade, last six numbers of the VIN 265104, valued at approximately \$37,000.

2. On or about September 15, 2009, at the City of Irvington and at the City of Newark, both in the County of Essex,

the said JOSEF ALLEN did knowingly traffic in, organize, plan, finance, direct, manage or supervise trafficking in stolen property valued in excess of \$500, that is he made arrangements for and sold the stolen property of K.C. of Newark and the Keystone Insurance Company/Mid-Atlantic AAA of Mount Laurel New Jersey, namely, a silver 2007 Cadillac Escalade, last six numbers of the VIN 265104, valued at approximately \$37,000.

3. On or about September 16, 2009, at the City of Irvington, in the County of Essex, the said KELLI COLEMAN did knowingly submit or caused to be submitted a claim for payment under an insurance policy with Keystone Insurance Company/Mid-Atlantic AAA for loss by theft, alleging the silver 2007 Cadillac Escalade, last six numbers of the VIN 265104, purchased by the said KELLI COLEMAN, from Crown Cadillac of Parsippany, New Jersey had been stolen from her; even though said automobile had not been stolen from her.

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 FIVE

(Fencing - Third Degree).

DEMOND CONLEY

and

JOSEF ALLEN

who are named as defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, on or about September 15, 2009, at the City of Irvington and at the City of Newark, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property valued in excess of \$500, that is, the said DEMOND CONLEY and JOSEF ALLEN did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property, namely, a silver 2007 Cadillac Escalade, last six numbers of the VIN 265104, belonging to K.C. of Newark, New Jersey and the Keystone Insurance Company/AAA Mid-Atlantic of Mount Laurel, New Jersey, valued at approximately \$37,000, knowing the same to have been stolen or believing that it had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7.1(b) and N.J.S.A. 2C: 2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Insurance Fraud - Second Degree)

KELLI COLEMAN

between on or about September 15, 2009 and on or about October 21, 2009 at the City of Irvington and at the City of Newark, both in the County of Essex, at the Township of Mount Laurel in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly commit Insurance Fraud, in that the said KELLI COLEMAN, did knowingly commit, five or more acts of insurance fraud, and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000.00, specifically the said KELLI COLEMAN did knowingly make, or cause to be made, false, fictitious, fraudulent or misleading statements of material fact in an insurance claim that the said KELLI COLEMAN did submit or caused to be submitted for payment under an insurance policy with Keystone Insurance Company/AAA Mid-Atlantic Insurance Group for loss by theft, alleging the silver 2007 Cadillac Escalade, last six numbers of the VIN 265104, leased by the said KELLI COLEMAN, from Crown Cadillac of Parsippany, New Jersey had been stolen: even though said automobile had not been stolen, by submitting the following false statements:

1) A police report filed by the said KELLI COLEMAN with the Irvington Police Department, on September 16, 2009, alleging the theft of the car and stating that the said KELLI COLEMAN last saw the silver 2007 Cadillac Escalade, at 28 Newton Place in

Irvington at approximately 12:00 p.m. on September 16, 2009, and that she discovered it missing an hour and a half later at approximately 1:30 p.m., when in truth and in fact, the vehicle had not been stolen but had been purchased as part of an undercover operation the day before, on September 15, 2009, in Irvington, N.J.

2) On September 16, 2009, the said KELLI COLEMAN, contacted the Keystone Insurance Company/AAA Mid-Atlantic Insurance Group and reported the silver 2007 Cadillac Escalade stolen, at approximately 1:30 p.m. on that date, when in truth and in fact, the vehicle had not been stolen but had been purchased as part of an undercover operation the day before, on September 15, 2009, in Irvington, N.J.

3) On September 18, 2009 the said KELLI COLEMAN advised the insurance company claims examiner, M.L. that she had contacted the "On-Star" vehicle tracking service and reported the vehicle stolen, immediately after she had reported the theft to the Irvington Police, when in truth and in fact, the vehicle had not been stolen but had been purchased as part of an undercover operation the day before, on September 15, 2009, in Irvington, N.J.

4) A tape recorded personal interview by a representative of Keystone Insurance Company/AAA Mid-Atlantic Insurance Group made on October 12, 2009 in which the said KELLI COLEMAN stated that she had parked the silver 2007 Cadillac Escalade at 28 Newton

Place in Irvington at about 12:00 p.m. and discovered the car stolen an hour and a half later, when in truth and in fact, the vehicle had not been stolen but had been purchased as part of an undercover operation the day before, on September 15, 2009, in Irvington, N.J.

5) An Affidavit of Theft made to Keystone Insurance Company/AAA Mid-Atlantic Insurance Group by the said KELLI COLEMAN on September 23, 2009 alleging the theft of the car and stating that she last saw the silver 2007 Cadillac Escalade where she had parked it at 28 Newton Place, in Irvington at approximately 12:00 p.m., when in truth and in fact, the vehicle had not been stolen but had been purchased as part of an undercover operation the day before, on September 15, 2009, in Irvington, N.J.

All contrary to the provisions of N.J.S.A. 2C:21-4.6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Fencing - Third Degree)

DEMOND CONLEY

who is named as a defendant herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, between on or about November 4, 2009, at the City of Irvington, in the County of Essex, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property valued in excess of \$500, that is, the said DEMOND did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property, namely, a black 2006 Chrysler 300, last six numbers of the VIN 248257, belonging to A.M. of Jersey City, New Jersey, valued at approximately \$19,500, knowing the same to have been stolen or believing that it had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7.1(b) and N.J.S.A. 2C: 2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Conspiracy - Second Degree)

DEMOND CONLEY

DEMETRIUS ROSS

and

TERRENCE SIMONSON

who are named as defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein between on or about November 7, 2009, and on or about November 10, 2009, in the County of Essex, at the City of Newark, in the County of Essex, at the Township of Middletown in the County of Monmouth, at the Township of Parsippany-Troy Hills, in the County of Morris, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting and facilitating the commission of the crimes of theft by unlawful taking, receiving stolen property, and fencing did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or

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

1. Knowingly did unlawfully take or exercise unlawful control over the moveable property of another, with an aggregate value in excess of \$75,000, with purpose to deprive the owner

thereof, contrary to the provisions of N.J.S.A. 2C:20-3;

2. Knowingly did receive or bring into this State movable property of another, knowing that the property had been stolen or believing that they had probably been stolen and valued in an aggregate amount in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:20-7.

3. Knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property valued in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:20-7.1(b).

4. Purposely hinder the detention, apprehension, investigation, prosecution, conviction or punishment of another by preventing or obstructing, by means of force, intimidation or deception, anyone from performing an act which might aid in the discovery or apprehension of another or in the lodging of a charge against him, contrary to the provisions of N.J.S.A. 2C:29-3(a)5.

The Grand Jurors aforesaid, upon their oaths, do further present that pursuant to the aforesaid conspiracy, the following overt acts, among others, were committed:

OVERT ACTS

1. On or about November 7, 2009, at the Township of Parsippany Troy-Hills and at the Township of Boonton, both in the County of Morris, the said DEMETRIUS ROSS knowingly did unlawfully take or exercise unlawful control over the moveable

property of S.A. of Boonton, New Jersey, namely a silver 2009 Nissan 370Z last six numbers of the VIN 403633, valued at approximately \$35,000.

2. On or about November 10, 2009, at the Township of Middletown, in the County of Monmouth, elsewhere, the said DEMETRIUS ROSS, knowingly did unlawfully take or exercise unlawful control over the moveable property of A.D. of Lincroft, New Jersey, namely, a silver 2008 BMW 750, last six numbers of VIN T11167, valued at approximately \$85,000.

3. On or about November 10, 2009, at the City of Irvington, in the County of Essex, the said DEMOND CONLEY did knowingly traffic in, organize, plan, finance, direct, manage or supervise trafficking in stolen property valued in excess of \$75,000, that is he made arrangements for and sold the stolen property of S.A. of Boonton, New Jersey, namely a silver 2009 Nissan 370Z, last six numbers of the VIN 403633, valued at approximately \$35,000 and a silver 2008 BMW 750, last six numbers of the VIN T11167, belonging to A.D. of Lincroft, New Jersey, valued at approximately \$85,000.

4. On or about November 10, 2009, at the City of Irvington, in the County of Essex, the said TERRENCE SIMONSON did purposely hinder the detention, apprehension, investigation, prosecution, conviction or punishment of DEMOND CONLEY, and DEMETRIUS ROSS by preventing or obstructing by means of force, members of the Essex/Union Auto Theft Task Force, from making

arrests by forcibly ramming a Essex/Union Auto Theft Task Force police vehicle using the vehicle he was driving.

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 NINE

(Theft by Unlawful Taking - Second Degree)

DEMETRIUS ROSS

who is named as a defendant herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, on or about November 6, 2009, at the Borough of Montvale and at the Borough of Woodcliff Lake, both in the County of Bergen, in the City of Newark and the City of Irvington, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise unlawful control over the moveable property of another, with a value in excess of \$75,000, with purpose to deprive the owner thereof, that is, the said DEMETRIUS ROSS, knowingly did unlawfully take or exercise unlawful control over the moveable property of BMW of North America, LLC of Woodcliff Lake, New Jersey, namely, a black 2009 BMW M5, last six numbers of VIN 043087, valued at approximately \$95,000, 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 TEN

(Receiving Stolen Property - Second Degree)

DEMETRIUS ROSS

who is named as a defendant herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, on or about November 6, 2009, at the Borough of Montvale and at the Borough of Woodcliff Lake, both in the County of Bergen, in the City of Newark and the City of Irvington, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly receive or bring into this State movable property of another, knowing that the property had been stolen or believing that it had probably been stolen and valued in an amount in excess of \$75,000; that is, the said DEMETRIUS ROSS knowingly did receive or bring into this State movable property of BMW of North America, LLC of Woodcliff Lake, New Jersey, namely, a black 2009 BMW M5, last six numbers of VIN 043087, valued at approximately \$95,000, knowing the same to be stolen or believing that it had probably been 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 ELEVEN

(Theft by Unlawful Taking - Third Degree)

DEMETRIUS ROSS

who is named as a defendant herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, on or about November 7, 2009, at the City of Irvington and at the City of Newark, both in the County of Essex, at the Township of Parsippany Troy-Hills and at the Township of Boonton, both in the County of Morris, elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise unlawful control over the moveable property of another, with a value in excess of \$500, with purpose to deprive the owner thereof, that is, the said DEMETRIUS ROSS, knowingly did unlawfully take or exercise unlawful control over the moveable property belonging to S.A. of Boonton, New Jersey namely, a silver 2009 Nissan 370Z, last six numbers of the VIN 403633, valued at approximately \$35,000, 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 TWELVE

(Receiving Stolen Property - Third Degree)

DEMETRIUS ROSS

who is named as a defendant herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, on or about November 7, 2009, at the City of Irvington and at the City of Newark, both in the County of Essex, at the Township of Parsippany Troy-Hills and at the Township of Boonton, both in the County of Morris, elsewhere, and within the jurisdiction of this Court, did knowingly receive or bring into this State movable property of another, knowing that the property had been stolen or believing that it had probably been stolen and valued in an amount in excess of \$500; that is, the said DEMETRIUS ROSS knowingly did receive or bring into this State movable property of S.A. of Boonton, New Jersey, namely, a silver 2009 Nissan 370Z, last six numbers of the VIN 403633, valued at approximately \$35,000, knowing the same to be stolen or believing that it had probably been 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 THIRTEEN

(Theft by Unlawful Taking - Second Degree)

DEMETRIUS ROSS

who is named as a defendant herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, on or about November 10, 2009, at the City of Irvington and at the City of Newark, both in the County of Essex, at the Township of Middletown, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise unlawful control over the moveable property of another, with a value in excess of \$75,000, with purpose to deprive the owner thereof, that is, the said DEMETRIUS ROSS, knowingly did unlawfully take or exercise unlawful control over the moveable property belonging to A.D. of Lincroft, New Jersey, namely, a silver 2008 BMW 750, last six numbers of VIN T11167, valued at approximately \$85,000, 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 FOURTEEN

(Receiving Stolen Property - Second Degree)

DEMETRIUS ROSS

who is named as a defendant herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein, on or about November 10, 2009, at the City of Irvington and at the City of Newark, both in the County of Essex, at the Township of Middletown, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, did knowingly receive or bring into this State movable property of another, knowing that the property had been stolen or believing that it had probably been stolen and valued in an amount in excess of \$75,000; that is, the said DEMETRIUS ROSS knowingly did receive or bring into this State movable property of A.D. of Lincroft, New Jersey, namely, a silver 2008 BMW 750, last six numbers of VIN T11167, valued at approximately \$85,000, knowing the same to be stolen or believing that it had probably been 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 FIFTEEN

(Fencing - Second Degree)

DEMOND CONLEY

DEMETRIUS ROSS

and

TERRENCE SIMONSON

who are named as defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, but who are not named as defendants herein between on or about November 7, 2009, and on or about November 10, 2009, at the City of Irvington, in the County of Essex, at the City of Newark, in the County of Essex, at the Township of Middletown in the County of Monmouth, at the Township of Parsippany-Troy Hills, in the County of Morris, elsewhere, and within the jurisdiction of this Court, did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property valued in excess of \$75,000, that is, the said DEMOND CONLEY, DEMETRIUS ROSS, and TERRENCE SIMONSON did knowingly traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property, namely, a silver Nissan 370Z, last six numbers of the VIN 403633, belonging to S.A. of Boonton, New Jersey, valued at approximately \$35,000, and a silver 2008 BMW 750, last six numbers of the VIN T11167, belonging to A.D. of Lincroft, New Jersey, valued at approximately \$85,000; knowing the same to have been stolen or

believing that it had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7.1(b) and N.J.S.A. 2C: 2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Eluding Officer - Second Degree)

DEMOND CONLEY

on or about November 10, 2009, at the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while operating a motor vehicle, did knowingly flee or attempt to elude a law enforcement officer after having received a signal from such officer to bring his vehicle to a full stop, and in so doing, created a risk of death or injury to a law enforcement officer and others, contrary to the provisions of N.J.S.A. 2C:29-2b, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Aggravated Assault - Second Degree)

DEMOND CONLEY

on or about November 10, 2009, at the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while operating a vehicle, did purposely or knowingly cause or attempt to cause serious bodily injury to law enforcement officers of the Essex/Union Auto Theft Task Force, contrary to the provisions of N.J.S.A. 2C:12-1b(1), and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Eluding Officer - Second Degree)

TERRENCE SIMONSON

on or about November 10, 2009, at the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while operating a motor vehicle, did knowingly flee or attempt to elude a law enforcement officer after having received a signal from such officer to bring his vehicle to a full stop, and in so doing, created a risk of death or injury to a law enforcement officer and others, contrary to the provisions of N.J.S.A. 2C:29-2b, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Aggravated Assault - Second Degree)

TERRENCE SIMONSON

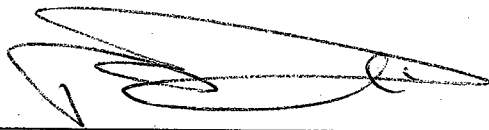
on or about November 10, 2009, at the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while operating a vehicle, did purposely or knowingly cause or attempt to cause serious bodily injury to law enforcement officers of the Essex/Union Auto Theft Task Force, contrary to the provisions of N.J.S.A. 2C:12-1b(1), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Hindering Apprehension Or Prosecution of Another -
Second Degree)

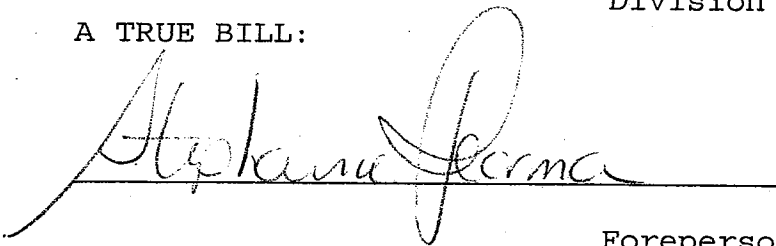
TERRENCE SIMONSON

on or about November 10, 2009, at the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to hinder the apprehension, prosecution, conviction or punishment of another person, that is, the said TERRENCE SIMONSON, did prevent or obstruct by means of force, intimidation or deception, anyone from performing an act which might aid in the discovery or apprehension of DEMOND CONLEY or in the lodging of a charge against DEMOND CONLEY, contrary to the provisions of N.J.S.A. 2C:29-3(a)5, and against the peace of this State, the government and dignity of the same.



Riza Dagli
Acting Insurance Fraud Prosecutor
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 4/15/2010

FILED

APR 15 2010

SUPERIOR COURT
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ584-10-10

Superior Court

Docket Number 10-04-00031-S

STATE OF NEW JERSEY)

v.)

DEMOND CONLEY)

TERRENCE SIMONSON)

DEMETRIUS ROSS)

JOSEF ALLEN)

KELLI COLEMAN)

and)

"JOHN DOE")

also known as)

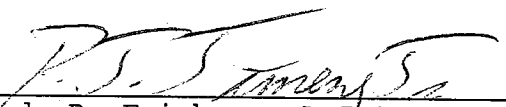
"J.P.")

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 15th day of April, 2010, 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.


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

Pedro T. Jimenez, Jr., J.S.C.