

**FILED**

OCT 14 2011

**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ610-11-7

Superior Court

Docket Number 11-10-00124-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

AMEER THOMPSON )

CARDIEA HARRELL )

and )

AARON WATSON )

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

COUNT ONE

(Conspiracy - Second Degree)

AMEER THOMPSON

and

CARDIEA HARRELL

and other individuals whose identities are both known and unknown  
to the Grand Jurors, who are co-conspirators but not named as  
defendants herein, between on or about March 16, 2010 and on or  
about June 10, 2010, at the Township of Edison, in the County of  
Middlesex, at the City of Newark, in the County of Essex,  
elsewhere, and within the jurisdiction of this Court, with the  
purpose of promoting or facilitating the commission of the crime  
of distribution of a controlled dangerous substance, did agree

that:

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

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

1a. Knowingly or purposely to distribute a controlled dangerous substance, that is, heroin, in a quantity of one-half ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1) and N.J.S.A. 2C:35-5(b)(2).

1b. Knowingly or purposely to distribute a controlled dangerous substance, that is, cocaine, in a quantity of five ounces 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)(1).

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 TWO

(Conspiracy - Second Degree)

CARDIEA HARRELL

and

AARON WATSON

and other individuals whose identities are both known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about May 9, 2010 and on or about June 10, 2010, at the Township of Edison, in the County of Middlesex, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of distribution of a controlled dangerous substance, did agree that:

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

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

1a. Knowingly or purposely to distribute a controlled dangerous substance, that is, heroin, in a quantity of one-half ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1) and N.J.S.A. 2C:35-5(b)(2).

1b. Knowingly or purposely to distribute a controlled

dangerous substance, that is, cocaine, in a quantity of five ounces 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)(1).

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

COUNT THREE

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

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance with intent to distribute, that is, cocaine, in a quantity of five ounces 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)(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

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

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance with intent to distribute, that is, heroin, in quantity of one-half 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)(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Possession of a Controlled  
Dangerous Substance - Third Degree)

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(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

(Possession of a Controlled  
Dangerous Substance - Third Degree)

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(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 of a Controlled Dangerous Substance  
with Intent to Distribute on or within 1,000 Feet  
of School Property - Third Degree)

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance with intent to distribute, that is, cocaine and heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of Camden Street School, and Avon Avenue School, which are 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 EIGHT

(Money Laundering - Third Degree)

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did commit the crime of money laundering, in that the said CARDIEA HARRELL and AARON WATSON, did transport or possess property in an amount less than \$75,000.00, known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25c, 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 of a Controlled Dangerous Substance  
with Intent to Distribute - Third Degree)

CARDIEA HARRELL

on or about June 10, 2010, at the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance with intent to distribute, that is, heroin, in a quantity of less than one-half 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)(2), and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Possession of a Controlled  
Dangerous Substance - Third Degree)

CARDIEA HARRELL

on or about June 10, 2010, at the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Certain Persons Not to Have Weapons - Second Degree)

CARDIEA HARRELL

on or about June 10, 2010, at the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute Within 1000 feet of School Property, on July 7, 1997 on Essex County Indictment ESX961204052I, did own, possess or control a Cobra .380 caliber handgun, model number FS380, serial number DEFACED, contrary to the provisions of N.J.S.A. 2C:39-7(b), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Possession of a Weapon During the  
Commission of Certain Crimes - Second Degree)

CARDIEA HARRELL

on or about June 10, 2010, at the Township of Edison, in the County of Middlesex, elsewhere and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a Cobra .380 Caliber handgun, Model FS380, serial number (defaced), in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5a, contrary to the provisions of N.J.S.A. 2C:39-4.1a, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

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

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance with intent to distribute, that is, heroin, in a quantity of less than one-half ounce 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)(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

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

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance with intent to distribute, that is, cocaine, in a quantity of one-half ounce or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), and N.J.S.A. 2C:35-5(b)(2) 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 of a Controlled  
Dangerous Substance - Third Degree)

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1) 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 of a Controlled  
Dangerous Substance - Third Degree)

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Possession of a Controlled Dangerous Substance  
with Intent to Distribute on or within 1,000 Feet  
of School Property - Third Degree)

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance with intent to distribute, that is, cocaine and heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of Camden Street 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 EIGHTEEN

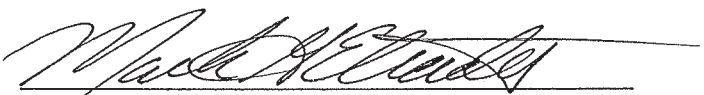
(Money Laundering - Third Degree)

CARDIEA HARRELL

and

AARON WATSON

on or about June 10, 2010, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did commit the crime of money laundering, in that the said CARDIEA HARRELL and AARON WATSON, did transport or possess property in an amount less than \$75,000.00, known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25c, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

  
SDAG, Mark Eliades  
Division of Criminal Justice

A TRUE BILL:

  
Foreperson

10/14/11

Dated

**FILED**

OCT 14 2011

**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ610-11-7

Superior Court

Docket Number 11-10-00124-S

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

AMEER THOMPSON )

CARDIEA HARRELL )

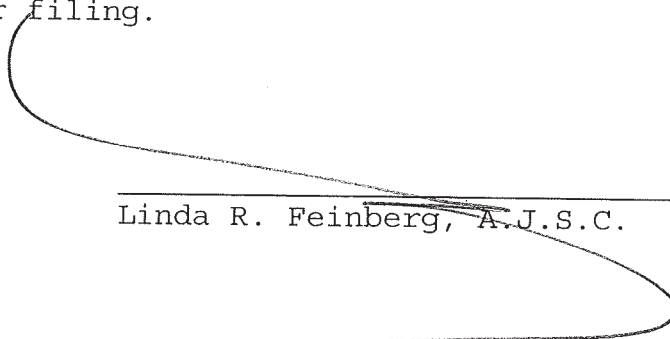
and )

AARON WATSON )

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

IT IS ORDERED on this 14th day of October, 2011, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Middlesex 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 Middlesex for filing.

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