

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Docket Number SGJ684-16-10

Superior Court

Docket Number 16 - 04 - 00067 - S

STATE OF NEW JERSEY

v.

KENNETH DANIELS

LEVELL BURNETT

FRAZIER GIBSON

RASHAWN GARTRELL

TYJA EVANS

DERRICK MOORE

DOMINIQUE DIAZ

IBN JONES

ALTERIQUE JONES

KHALIL CULBREATH

TYREE JOHNSON

TERRENCE WILSON

DAMION MIKELL

PETER CLELAND

DONELL CARROLL

ERIC AIKENS

JULIAN ATTA-POKU

ANDREA BROWN

**FILED**  
APR 28 2016  
State Grand Jury Judge

ADAMA FOFANA )  
ALPHA JALLOH )  
SOWAH ANAN )  
MARQUIS PRICE )

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

COUNT ONE

(Racketeering - First Degree)

KENNETH DANIELS

LEVELL BURNETT

FRAZIER GIBSON

RASHAWN GARTRELL

TYJA EVANS

DERRICK MOORE

IBN JONES

ALTERIQUE JONES

KHALIL CULBREATH

TYREE JOHNSON

TERRENCE WILSON

DAMION MIKELL

PETER CLELAND

DONELL CARROLL

ERIC AIKENS

JULIAN ATTA-POKU

ANDREA BROWN

ADAMA FOFANA

ALPHA JALLOH

SOWAH ANAN

AND

MARQUIS PRICE

and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members of the criminal enterprise, but not defendants herein, at the times and places hereinafter specified, did commit the crime of racketeering, that is, the defendants and other persons employed by or associated with the enterprise engaged in activities which affected trade or commerce in the State of New Jersey, in that they:

1. Purposely or knowingly did conduct or participate directly or indirectly in the conduct of the enterprise's affairs through a pattern of racketeering activity, including the commission of crimes of the first degree, contrary to the provisions of N.J.S.A. 2C:41-2c; or

2. With the purpose of promoting or facilitating the commission of the crime of racketeering, did conspire or agree together and with persons whose identities are known and unknown to the Grand Jurors, 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 or participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, including the commission of crimes of the first degree, in violation of N.J.S.A. 2C:41-2d, all as hereinafter described.

#### THE RELEVANT TIMES AND PLACES

The predicate criminal activity occurred between on or about June 1, 2014 and on or about January 7, 2016, at the Town of Clinton and at the Township of Tewksbury, both in the County of Hunterdon, at the Borough of Hasbrouck Heights, at the Borough of Demarest, at the Borough of Edgewater, at the City of Englewood, at the Borough of Fort Lee, at the Township of Mahwah, at the Borough of Paramus, at the Village of Ridgewood, and at the Borough of Upper Saddle River, all in the County of Bergen, at the Township of West Caldwell, at the Township of Verona, at the Township of Bloomfield, at the City of Newark, at the City of Orange, at the City of East Orange, and at the Township of Montclair, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus, and at the City of Hoboken, all in the County of Hudson, at the City of South Amboy, in the County of Middlesex, at the Township of Colts Neck, at the Borough of Avon by the Sea, at the Borough of Bradley Beach, at the Township of Holmdel, at the Borough of Rumson, and at the

Borough of Tinton Falls, all in the County of Monmouth, at the Township of Hanover, at the Township of Chatham, at the Township of Harding, and at the Borough of Madison, all in the County of Morris, at the City of Clifton, in the County of Passaic, at the Borough of Somerville and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, in the County of Union, at the Township of Toms River, in the County of Ocean; in the State of New York; in the Country of Ghana; in the Country of Nigeria; elsewhere, and within the jurisdiction of this Court.

#### THE ENTERPRISE

KENNETH DANIELS, LEVELL BURNETT, FRAZIER GIBSON, RASHAWN GARTRELL, TYJA EVANS, DERRICK MOORE, IBN JONES, ALTERIQUE JONES, KHALIL CULBREATH, TYREE JOHNSON, TERRENCE WILSON, DAMION MIKELL, PETER CLELAND, DONELL CARROLL, ERIC AIKENS, JULIAN ATTA-POKU, ANDREA BROWN, ADAMA FOFANA, ALPHA JALLOH, SOWAH ANAN, MARQUIS PRICE, and other persons whose identities are known and unknown to the Grand Jurors, did constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, for the purposes set forth below.

#### THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise included obtaining money for members and associates of the enterprise through violations of the laws of the State of New Jersey, including but not limited to Financial Facilitation of Criminal Activity, Leader of an Auto Theft Trafficking Network, Carjacking, Robbery, Burglary, Aggravated Assault, Fencing-Dealing in Stolen Property, Receiving

Stolen Property, Theft by Unlawful Taking, Theft by Deception, and Altering a Motor Vehicle Identification Number.

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 conduct by members of the enterprise, during the relevant time, including: Financial Facilitation of Criminal Activity, Leader of an Auto Theft Trafficking Network, Carjacking, Robbery, Burglary, Aggravated Assault, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, Theft by Deception, and Altering a Motor Vehicle Identification Number, and Conspiracy to commit these crimes, as described herein, and in Counts Two through Twenty-Five of this Indictment.

KENNETH DANIELS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Aggravated Assault, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Eleven, Twelve, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

LEVELL BURNETT

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which

Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

FRAZIER GIBSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

RASHAWN GARTRELL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Carjacking, Robbery, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Five, Six, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

TYJA EVANS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Leader of an Auto Theft Trafficking Network, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Four, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

DERRICK MOORE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Carjacking, Robbery, Aggravated Assault, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, Burglary, Attempted Theft, which Racketeering conduct is the subject of Counts Two, Three, Seven, Eight, Nine, Ten, Fourteen, Fifteen, Sixteen, Seventeen and Twenty-One of this Indictment.

IBN JONES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Leader of an Auto Theft Trafficking Network, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Four, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

ALTERIQUE JONES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

KHALIL CULBREATH

did commit the racketeering conduct by engaging in or conspiring



to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

TYREE JOHNSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

TERRENCE WILSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

DAMION MIKELL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, Burglary, Altering a Motor Vehicle Identification Number, and Attempted Theft by Deception, which Racketeering conduct is the subject of Counts Two, Three,

Fourteen, Fifteen, Sixteen, Seventeen, Twenty-Two, and Twenty-Five of this Indictment.

PETER CLELAND

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, Burglary, and Altering a Motor Vehicle Identification Number which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, Seventeen, and Twenty-Two of this Indictment.

DONELL CARROLL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

ERIC AIKENS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

JULIAN ATTA-POKU

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

ANDREA BROWN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Burglary, and Theft by Deception, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Seventeen, and Twenty-Three of this Indictment.

ADAMA FOFANA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

ALPHA JALLOH

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

SOWAH ANAN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen, of this Indictment.

MARQUIS PRICE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Financial Facilitation of Criminal Activity, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, which Racketeering conduct is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen, of this Indictment.

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

COUNT TWO

(Conspiracy - First Degree)

KENNETH DANIELS

LEVELL BURNETT

FRAZIER GIBSON

RASHAWN GARTRELL

TYJA EVANS

DERRICK MOORE

IBN JONES

ALTERIQUE JONES

KHALIL CULBREATH

TYREE JOHNSON

TERRENCE WILSON

DAMION MIKELL

PETER CLELAND

DONELL CARROLL

ERIC AIKENS

JULIAN ATTA-POKU

ANDREA BROWN

ADAMA FOFANA

ALPHA JALLOH

SOWAH ANAN

AND

MARQUIS PRICE

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, between on or about June 1, 2014 and on or about January 6, 2016, at the Town of Clinton and at the Township of Tewksbury, both in the County of Hunterdon, at the Borough of Hasbrouck Heights, at the Borough of Demarest, at the Borough of Edgewater, at the City of Englewood, at the Borough of Fort Lee, at the Township of Mahwah, at the Borough of Paramus, at the Village of Ridgewood, and at the Borough of Upper Saddle River, all in the County of Bergen, at the Township of West Caldwell, at the Township of Verona, at the Township of Bloomfield, at the City of Newark, at the City of Orange, at the City of East Orange, and at the Township of Montclair, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus, and at the City of Hoboken, all in the County of Hudson, at the City of South Amboy, in the County of Middlesex, at the Township of Colts Neck, at the Borough of Avon by the Sea, at the Borough of Bradley Beach, at the Township of Holmdel, at the Borough of Rumson, and at the Borough of Tinton Falls, all in the County of Monmouth, at the Township of Hanover, at the Township of Chatham, at the Township of Harding, and at the Borough of Madison, all in the County of Morris, at the City of Clifton, in the County of Passaic, at the Borough of Somerville and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, in the County of Union, at the Township of Toms River, in the County of Ocean; in the State of New York; in the Country of Ghana; in the Country of Nigeria; elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or

facilitating the commission of the crimes of Financial Facilitation of Criminal Activity, Carjacking, Robbery, Burglary, Aggravated Assault, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, Theft by Deception, and Altering a Motor Vehicle Identification Number, did agree together and with persons known to the Grand Jurors who were acting at the direction of law enforcement 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 said crimes, that is:

1. Knowingly or purposely to transport or possess property known, or which a reasonable person would believe to be, derived from criminal activity, with a value in excess of \$500,000.00, or to engage in transactions involving such property with the intent to facilitate the criminal activity, contrary to the provisions of N.J.S.A. 2C:-21-25a and N.J.S.A. 2C:21-25b(1); and

2. Knowingly or purposely to use force upon an occupant or person in possession or control of a motor vehicle, or to threaten an occupant or person in control of a motor vehicle, or to put them in fear of, immediate bodily injury, while in the course of committing an unlawful taking of a motor vehicle, or in an attempt to commit an unlawful taking of a motor vehicle, contrary to the provisions of N.J.S.A. 2C:15-2a(1) and (2); and

3. Knowingly or purposely to use force upon another, or to threaten another with, or put another in fear of, immediate

bodily injury while in the course of committing a theft, contrary to the provisions of N.J.S.A. 2C:-15-1(a) and (b); and

4. Knowingly or purposely to enter a motor vehicle with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2a(1); and

5. Knowingly or purposely to point a firearm at another under circumstances manifesting extreme indifference to the value of human life, contrary to the provisions N.J.S.A. 2C:12-1b(4);

6. Knowingly or purposely to traffic in, or initiate organize, plan, finance, direct, manage, or supervise the trafficking in stolen property having a value in excess of \$75,000.00, contrary to the provisions of N.J.S.A. 2C:20-7.1(b); and

7. Knowingly or purposely to commit theft by receiving or bringing into this State moveable property of another having a value in excess of \$75,000.00, 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(a); and

8. Knowingly or purposely to unlawfully exercise control over moveable property of another, having a value in excess of \$75,000.00 with purpose to deprive the owners thereof, contrary to the provisions of N.J.S.A. 2C:20-3a; and

9. Knowingly or purposely to obtain the property of an another, by deception, having an aggregate value in excess of \$75,000.00, by deception, contrary to N.J.S.A. 2C:20-4; and



10. Knowingly or purposely to remove, alter, or change the motor vehicle identification number on a motor vehicle for an unlawful purpose, contrary to the provisions of N.J.S.A. 2C:17-6(a); and

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

(Financial Facilitation of Criminal Activity - First Degree)

KENNETH DANIELS

LEVELL BURNETT

FRAZIER GIBSON

RASHAWN GARTRELL

TYJA EVANS

DERRICK MOORE

IBN JONES

ALTERIQUE JONES

KHALIL CULBREATH

TYREE JOHNSON

TERRENCE WILSON

DAMION MIKELL

PETER CLELAND

DONELL CARROLL

ERIC AIKENS

JULIAN ATTA-POKU

ANDREA BROWN

ADAMA FOFANA

ALPHA JALLOH

SOWAH ANAN

AND

MARQUIS PRICE

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, between on or about June 1, 2014 and on or about, January 7, 2016, at the Town of Clinton and at the Township of Tewksbury, both in the County of Hunterdon, at the Borough of Hasbrouck Heights, at the Borough of Demarest, at the Borough of Edgewater, at the City of Englewood, at the Borough of Fort Lee, at the Township of Mahwah, at the Borough of Paramus, at the Village of Ridgewood, and at the Borough of Upper Saddle River, all in the County of Bergen, at the Township of West Caldwell, at the Township of Verona, at the Township of Bloomfield, at the City of Newark, at the City of Orange, at the City of East Orange, and at the Township of Montclair, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus, and at the City of Hoboken, all in the County of Hudson, at the City of South Amboy, in the County of Middlesex, at the Township of Colts Neck, at the Borough of Avon by the Sea, at the Borough of Bradley Beach, at the Township of Holmdel, at the Borough of Rumson, and at the Borough of Tinton Falls, all in the County of Monmouth, at the Township of Hanover, at the Township of Chatham, at the Township of Harding, and at the Borough of Madison, all in the County of Morris, at the City of Clifton, in the County of Passaic, at the Borough of Somerville and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, in the County of Union, at the Township of Toms River, in the County of Ocean; in the State of New York; in the Country of Ghana; in the Country of Nigeria; elsewhere, and within the jurisdiction of this Court, did commit the offense of financial facilitation of criminal activity, in

that, the said KENNETH DANIELS, LEVELL BURNETT, FRAZIER GIBSON, RASHAWN GARTRELL, TYJA EVANS, DERRICK MOORE, IBN JONES, ALTERIQUE JONES, KHALIL CULBREATH, TYREE JOHNSON, TERRENCE WILSON, DAMION MIKELL, PETER CLELAND, DONELL CARROLL, ERIC AIKENS, JULIAN ATTA-POKU, ANDREA BROWN, ADAMA FOFANA, ALPHA JALLOH, SOWAH ANAN, MARQUIS PRICE and other persons whose identities are known and unknown to the Grand Jurors, did transport or possess property known, or which a reasonable person would believe to be, derived from criminal activity, with a value in excess of \$500,000.00, or did engage in transactions involving such property with the intent to facilitate the criminal activity, all contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Leader of an Auto Theft Trafficking Network- Second Degree)

TYJA EVANS

and

IBN JONES

between on or about June 1, 2014 and October 27, 2015, at the Town of Clinton and at the Township of Tewksbury, both in the County of Hunterdon, at the Borough of Hasbrouck Heights, at the Borough of Demarest, at the Borough of Edgewater, at the City of Englewood, at the Borough of Fort Lee, at the Township of Mahwah, at the Borough of Paramus, at the Village of Ridgewood, and at the Borough of Upper Saddle River, all in the County of Bergen, at the Township of West Caldwell, at the Township of Verona and at the Township of Bloomfield, at the City of Newark, at the City of Orange, at the City of East Orange, and at the Township of Montclair, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus, and at the City of Hoboken, all in the County of Hudson, at the City of South Amboy, in the County of Middlesex, at the Township of Colts Neck, at the Borough of Avon by the Sea, at the Borough of Bradley Beach, at the Township of Holmdel, at the Borough of Rumson, and at the Borough of Tinton Falls, all in the County of Monmouth, at the Township of Hanover, at the Township of Chatham, at the Township of Harding, and at the Borough of Madison, all in the County of Morris, at the City of Clifton, in the County of Passaic, at the Borough of Somerville and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, in the County

of Union, at the Township of Toms River, in the County of Ocean; in the State of New York; in the Country of Ghana; in the Country of Nigeria; elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as organizers, supervisors, financiers or managers, 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, contrary to the provisions of N.J.S.A. 2C:20-18, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Carjacking - First Degree)

RASHAWN GARTRELL

on or about August 24, 2015, at the Township of Montclair, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while in the course of committing an unlawful taking of a motor vehicle, or in an attempt to commit an unlawful taking of a motor vehicle, knowingly did threaten G.A. with, or purposely or knowingly put G.A. in fear of, immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-2a(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Robbery - First Degree)

RASHAWN GARTRELL

on or about August 24, 2015, at the Township of Montclair, in the County of Essex, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did threaten G.A. with, or purposely did put G.A. in fear of, immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-1(a)(2), N.J.S.A. 2C:15-1(b), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT SEVEN

(Carjacking - First Degree)

DERRICK MOORE

on or about October 6, 2015, at the Township of Hanover, in the County of Morris, elsewhere, and within the jurisdiction of this Court, while in the course of committing an unlawful taking of a motor vehicle, or in an attempt to commit an unlawful taking of a motor vehicle, knowingly did use force upon C.C., or did threaten C.C. with, or purposely or knowingly did put C.C. in fear of immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-2a(1), N.J.S.A. 2C:15-2a(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Robbery - First Degree)

DERRICK MOORE

on or about October 6, 2015, at the Township of Hanover, in the County of Morris, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did use force upon C.C., or threaten C.C. with, or purposely put C.C. in fear of immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-1(a)(1), N.J.S.A. 2C:15-1(a)(2) N.J.S.A. 2C:15-1(b), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Burglary - Second Degree)

DERRICK MOORE

on or about October 6, 2015, at the Township of Hanover, in the County of Morris, elsewhere, and within the jurisdiction of this Court, did knowingly enter a motor vehicle with the purpose to commit an offense therein, while armed with or displaying what appeared to be a deadly weapon, contrary to the provisions of N.J.S.A. 2C:18-2a(1) N.J.S.A. 2C:18-2b(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Aggravated Assault - Fourth Degree)

DERRICK MOORE

on or about October 6, 2015, at the Township of Hanover, in the County of Morris, elsewhere, and within the jurisdiction of this Court, knowingly did point a firearm in the direction of C.C. under circumstances manifesting extreme indifference to the value of human life, contrary to the provisions of N.J.S.A. 2C:12-1b(4), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Aggravated Assault - Second Degree)

KENNETH DANIELS

on or about March 18, 2015, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to New Jersey State Trooper Dwayne Golding, Badge #7305, 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 TWELVE

(Aggravated Assault - Third Degree)

KENNETH DANIELS

on or about March 18, 2015, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause bodily injury to New Jersey State Trooper Dwayne Golding, Badge #7305, with a deadly weapon, that is a motor vehicle, contrary to the provisions of N.J.S.A. 2C:12-1b(2), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Resisting Arrest - Third Degree)

KENNETH DANIELS

on or about March 18, 2015, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely prevent or attempt to prevent Sergeant Dennis Vukosa, of the New Jersey State Police, Badge #5851, from effecting a lawful arrest, by using a motor vehicle to create a substantial risk of causing physical injury to New Jersey State Trooper Dwayne Golding, Badge #7305, and others, contrary to the provisions of N.J.S.A. 2C:29-2a(3)(b), and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Fencing-Dealing in Stolen Property - Second Degree)

KENNETH DANIELS

LEVELL BURNETT

FRAZIER GIBSON

RASHAWN GARTRELL

TYJA EVANS

DERRICK MOORE

IBN JONES

ALTERIQUE JONES

KHALIL CULBREATH

TYREE JOHNSON

TERRENCE WILSON

DAMION MIKELL

PETER CLELAND

DONELL CARROLL

ERIC AIKENS

JULIAN ATTA-POKU

ANDREA BROWN

ADAMA FOFANA

ALPHA JALLOH

SOWAH ANAN

AND

MARQUIS PRICE

and other persons whose identities are known and unknown to the  
Grand Jurors, between on or about June 1, 2014 and on or about



January 7, 2016, at the Town of Clinton and at the Township of Tewksbury, both in the County of Hunterdon, at the Borough of Hasbrouck Heights, at the Borough of Demarest, at the Borough of Edgewater, at the City of Englewood, at the Borough of Fort Lee, at the Township of Mahwah, at the Borough of Paramus, at the Village of Ridgewood, and at the Borough of Upper Saddle River, all in the County of Bergen, at the Township of West Caldwell, at the Township of Verona, at the Township of Bloomfield, at the City of Newark, at the City of Orange, at the City of East Orange, and at the Township of Montclair, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus, and at the City of Hoboken, all in the County of Hudson, at the City of South Amboy, in the County of Middlesex, at the Township of Colts Neck, at the Borough of Avon by the Sea, at the Borough of Bradley Beach, at the Township of Holmdel, at the Borough of Rumson, and at the Borough of Tinton Falls, all in the County of Monmouth, at the Township of Hanover, at the Township of Chatham, at the Township of Harding, and at the Borough of Madison, all in the County of Morris, at the City of Clifton, in the County of Passaic, at the Borough of Somerville and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, in the County of Union, at the Township of Toms River, in the County of Ocean; in the State of New York; in the Country of Ghana; in the Country of Nigeria; elsewhere, and within the jurisdiction of this Court did traffic in, or initiate, organize, plan, finance, direct, manage, or supervise the trafficking in stolen motor vehicles having a value in excess of \$75,000.00,

contrary to the provisions of N.J.S.A. 2C:20-7.1b, N.J.S.A. 2C:2-6, N.J.S.A. 2C:20-2, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Receiving Stolen Property - Second Degree)

KENNETH DANIELS

LEVELL BURNETT

FRAZIER GIBSON

RASHAWN GARTRELL

TYJA EVANS

DERRICK MOORE

IBN JONES

ALTERIQUE JONES

KHALIL CULBREATH

TYREE JOHNSON

TERRENCE WILSON

DAMION MIKELL

PETER CLELAND

DONELL CARROLL

ERIC AIKENS

JULIAN ATTA-POKU

ANDREA BROWN

ADAMA FOFANA

ALPHA JALLOH

SOWAH ANAN

AND

MARQUIS PRICE

and other persons whose identities are known and unknown to the

Grand Jurors, between on or about June 1, 2014, and on or about January 7, 2016, at the Town of Clinton and at the Township of Tewksbury, both in the County of Hunterdon, at the Borough of Hasbrouck Heights, at the Borough of Demarest, at the Borough of Edgewater, at the City of Englewood, at the Borough of Fort Lee, at the Township of Mahwah, at the Borough of Paramus, at the Village of Ridgewood, and at the Borough of Upper Saddle River, all in the County of Bergen, at the Township of West Caldwell, at the Township of Verona, at the Township of Bloomfield, at the City of Newark, at the City of Orange, at the City of East Orange, and at the Township of Montclair, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus, and at the City of Hoboken, all in the County of Hudson, at the City of South Amboy, in the County of Middlesex, at the Township of Colts Neck, at the Borough of Avon by the Sea, at the Borough of Bradley Beach, at the Township of Holmdel, at the Borough of Rumson, and at the Borough of Tinton Falls, all in the County of Monmouth, at the Township of Hanover, at the Township of Chatham, at the Township of Harding, and at the Borough of Madison, all in the County of Morris, at the City of Clifton, in the County of Passaic, at the Borough of Somerville and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, in the County of Union, at the Township of Toms River, in the County of Ocean; in the State of New York; in the Country of Ghana; in the Country of Nigeria; elsewhere, and within the

jurisdiction of this Court, did commit theft by knowingly receiving or bringing into this State moveable property of others, that is, motor vehicles, having a value in excess of \$75,000.00, knowing the same to be stolen or believing that they had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7, N.J.S.A. 2C:20-2, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Theft by Unlawful Taking - Second Degree)

KENNETH DANIELS

LEVELL BURNETT

FRAZIER GIBSON

RASHAWN GARTRELL

TYJA EVANS

DERRICK MOORE

IBN JONES

ALTERIQUE JONES

KHALIL CULBREATH

TYREE JOHNSON

TERRENCE WILSON

DAMION MIKELL

PETER CLELAND

DONELL CARROLL

ERIC AIKENS

JULIAN ATTA-POKU

ADAMA FOFANA

ALPHA JALLOH

SOWAH ANAN

AND

MARQUIS PRICE

and other persons whose identities are known and unknown to the  
Grand Jurors, between on or about June 1, 2014 and on or about,

January 7, 2016, at the Town of Clinton and at the Township of Tewksbury, both in the County of Hunterdon, at the Borough of Hasbrouck Heights, at the Borough of Demarest, at the Borough of Edgewater, at the City of Englewood, at the Borough of Fort Lee, at the Township of Mahwah, at the Borough of Paramus, at the Village of Ridgewood, and at the Borough of Upper Saddle River, all in the County of Bergen, at the Township of West Caldwell, at the Township of Verona, at the Township of Bloomfield, at the City of Newark, at the City of Orange, at the City of East Orange, and at the Township of Montclair, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus, and at the City of Hoboken, all in the County of Hudson, at the City of South Amboy, in the County of Middlesex, at the Township of Colts Neck, at the Borough of Avon by the Sea, at the Borough of Bradley Beach, at the Township of Holmdel, at the Borough of Rumson, and at the Borough of Tinton Falls, all in the County of Monmouth, at the Township of Hanover, at the Township of Chatham, at the Township of Harding, and at the Borough of Madison, all in the County of Morris, at the City of Clifton, in the County of Passaic, at the Borough of Somerville and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, in the County of Union, at the Township of Toms River, in the County of Ocean; in the State of New York; in the Country of Ghana; in the County of Nigeria, elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise control over moveable property of others, that is motor

vehicles, having a value in excess of \$75,000.00, with purpose to deprive the owners thereof, contrary to the provisions of N.J.S.A. 2C:20-3a, N.J.S.A. 2C:20-2, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT SEVENTEEN

(Burglary - Third Degree)

KENNETH DANIELS

LEVELL BURNETT

FRAZIER GIBSON

RASHAWN GARTRELL

TYJA EVANS

DERRICK MOORE

DOMINIQUE DIAZ

IBN JONES

ALTERIQUE JONES

KHALIL CULBREATH

TYREE JOHNSON

TERRENCE WILSON

DAMION MIKELL

PETER CLELAND

DONELL CARROLL

ERIC AIKENS

JULIAN ATTA-POKU

ANDREA BROWN

ADAMA FOFANA

ALPHA JALLOH

SOWAH ANAN

AND

MARQUIS PRICE

and other persons whose identities are known and unknown to the Grand Jurors, between on or about June 1, 2014 and on or about, January 7, 2016, at the Town of Clinton and at the Township of Tewksbury, both in the County of Hunterdon, at the Borough of Hasbrouck Heights, at the Borough of Demarest, at the Borough of Edgewater, at the City of Englewood, at the Borough of Fort Lee, at the Township of Mahwah, at the Borough of Paramus, at the Village of Ridgewood, and at the Borough of Upper Saddle River, all in the County of Bergen, at the Township of West Caldwell, at the Township of Verona, at the Township of Bloomfield, at the City of Newark, at the City of Orange, at the City of East Orange, and at the Township of Montclair, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus, and at the City of Hoboken, all in the County of Hudson, at the City of South Amboy, in the County of Middlesex, at the Township of Colts Neck, at the Borough of Avon by the Sea, at the Borough of Bradley Beach, at the Township of Holmdel, at the Borough of Rumson, and at the Borough of Tinton Falls, all in the County of Monmouth, at the Township of Hanover, at the Township of Chatham, at the Township of Harding, and at the Borough of Madison, all in the County of Morris, at the City of Clifton, in the County of Passaic, at the Borough of Somerville and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, in the County of Union, at the Township of Toms River, in the County of Ocean; in the State of New York; elsewhere, and within the jurisdiction of this Court, knowingly did enter a

motor vehicle or motor vehicles with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Eluding - Second Degree)

IBN JONES

on or about June 28, 2015, at the Township of Fairfield, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while operating a motor vehicle on a street or a highway of this State, did knowingly flee or attempt to elude Officer Ray Pulse, of the Fairfield Police Department, after having received a signal from such officer to bring the vehicle to a full stop, and created a risk of death or injury to another, 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

(Eluding - Second Degree)

DONELL CARROLL

on or about February 22, 2015, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while operating a motor vehicle on a street or a highway of this State, did knowingly flee or attempt to elude Officer Bozios from the Essex County Sheriff's Department, after having received a signal from such officer to bring the vehicle to a full stop and created a risk of death or injury to any person, 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 TWENTY

(Eluding - Second Degree)

DONELL CARROLL

on or about September 16, 2015, at the Township of Clinton, in the County of Hunterdon, elsewhere, and within the jurisdiction of this Court, while operating a motor vehicle on a street or a highway of this State, did knowingly flee or attempt to elude Officer Drew Macqueen, of the Clinton Police Department after having received a signal from such officer to bring the vehicle to a full stop and create a risk of death or injury to any person, 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 TWENTY-ONE

(Attempted Theft By Unlawful Taking-Third Degree)

DERRICK MOORE

and

DOMINIQUE DIAZ

on or about November 26, 2014, at the Town of Upper Saddle River, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, purposely did attempt to unlawfully take or exercise control over moveable property of another, that is a motor vehicle, having a value in excess of \$500.00, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1, N.J.S.A. 2C:20-3a, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Altering a Motor Vehicle Identification Number - Third Degree)

PETER CLELAND

and

DAMION MIKELL

between on or about June 1, 2014 and on or about October 27, 2015, at the City of Newark, at the City of Orange, at the City of East Orange, all in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did remove, alter, or change the motor vehicle identification number on motor vehicles for an unlawful purpose, contrary to the provisions of N.J.S.A. 2C:17-6, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT TWENTY-THREE

(Theft by Deception - Second Degree)

ANDREA BROWN

between on or about January 5, 2016, and on or about January 7, 2016, at the Borough of Wallington, in the County of Bergen, in the State of New York, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another having an aggregate value of \$75,000.00 or more, by deception, that is, ANDREA BROWN purposely did steal motor vehicles by presenting fraudulent credit cards and fictitious drivers licenses to rental car agencies, thereby creating or reinforcing a false impression to the rental agencies as to her identity, and the validity of the credit cards and drivers license;

WHEREAS IN TRUTH AND IN FACT, as the said ANDREA BROWN well knew, the licenses and credit cards were not legitimate, and said ANDREA BROWN, did not intend to return said motor vehicles to the rental agencies, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Insurance Fraud-Third Degree)

DAMION MIKELL

between on or about January 21, 2015, and on or about October 27, 2015, at the City of Newark, in the County of Essex, at the Borough of Hasbrouck Heights, in the County of Bergen, elsewhere and within the jurisdiction of this Court, knowingly made, or caused to be made, any false, fictitious, fraudulent, or misleading statements of material fact in, or did knowingly omit or caused to be omitted a material fact from any record, bill, claim, or other documents in writing, electronically, orally, or in any other form, that is, the said DAMION MIKELL, attempted to submit, submitted, caused to be submitted, or attempted to cause to be submitted for payment, reimbursement, or other benefit pursuant to an insurance policy, or from an insurance company, a claim indicating, that his 2014 Chrysler 300 was stolen from a car wash on September 18, 2015;

WHEREAS IN TRUTH AND IN FACT, as the said DAMION MIKELL, well knew, the vehicle was not stolen from him on that date, 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 TWENTY-FIVE

(Attempted Theft by Deception - Third Degree)

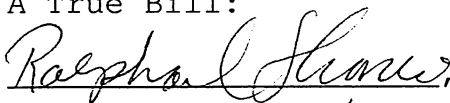
DAMION MIKELL

between on or about January 21, 2015, and on or about October 27, 2015, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, purposely did attempt to obtain property of another by deception in an amount in excess of \$500.00, that is the said, DAMION MIKELL, purposely did attempt to obtain property in an amount in excess of \$500.00 from an insurance company, by creating and reinforcing the false impression that his 2014 Chrysler 300 was stolen;

WHEREAS, IN TRUTH AND IN FACT, as the said DAMION MIKELL well knew, the 2014 Chrysler 300 was not stolen from him, contrary to the provisions of N.J.S.A. 2C:5-1, N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of the same.

  
Elie Honig, Director  
Division of Criminal Justice

A True Bill:

 Foreperson

Dated: 4/28/2016

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ684-16-10

Superior Court

Docket Number ~~16-04-00067-0~~

STATE OF NEW JERSEY

v.

KENNETH DANIELS

LEVELL BURNETT

FRAZIER GIBSON

RASHAWN GARTRELL

TYJA EVANS

DERRICK MOORE

DOMINIQUE DIAZ

IBN JONES

ALTERIQUE JONES

KHALIL CULBREATH

TYREE JOHNSON

TERRENCE WILSON

DAMION MIKELL

PETER CLELAND

DONELL CARROLL

ERIC AIKENS

JULIAN ATTA-POKU

ANDREA BROWN

ORDER OF VENUE

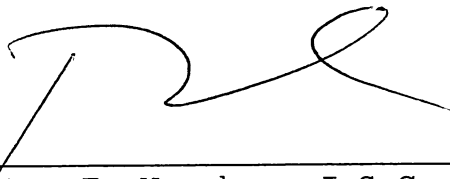
**FILED**  
APR 28 2016  
State Grand Jury Judge

ADAMA FOFANA )  
ALPHA JALLOH )  
SOWAH ANAN )  
and )  
MARQUIS PRICE )

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

IT IS ORDERED on this *28<sup>th</sup>* day of *April*, 2016, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Morris 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 Morris for filing.

  
\_\_\_\_\_  
Peter E. Warshaw, J.S.C.