

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ757-21-6
Superior Court
Docket Number 21-7-96-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

CHARLES M. WILLIS)

SHAIQUAN HEARNS)

DAVION FENDERSON)

RICHARD FENDERSON)

BOBBY HOOD)

DION BATTLE)

YAHONATAN SALTER)

SHAWN ANDERSON)

ZAIRE JACKSON)

DAVID WILLIAMS)

DAHQUAY POOLE)

TRE WHETSTONE)

CHARLES J. WILLIS)

FREDRICK EUTSEY)

JOHN COLVIN JR.)

LAURENCE GREEN)

BRIANA BLUE)

TAMEKA FLEMMING)

ASHLEY JONES)
and)
BRITTANI MIMS)

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

COUNT ONE

(Racketeering - First Degree)

CHARLES M. WILLIS

SHAIQUAN HEARNS

DAVION FENDERSON

RICHARD FENDERSON

BOBBY HOOD

DION BATTLE

YAHONATAN SALTER

SHAWN ANDERSON

ZAIRE JACKSON

DAVID WILLIAMS

DAHQUAY POOLE

TRE WHETSTONE

CHARLES J. WILLIS

FREDRICK EUTSEY

JOHN COLVIN JR.

LAURENCE GREEN

BRIANA BLUE

TAMEKA FLEMMING

ASHLEY JONES

and

BRITTANI MIMS

and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members of the enterprise, but not as defendants herein, at the times and places herein specified, did commit the crime of Racketeering, that is, the defendants and other persons employed by or associated with the enterprise engaged in the activities which affected trade or commerce, 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 violence, crimes of the first degree, and crimes involving the use of firearms, in violation 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 agree that:
 - A. One or more of them would engage in conduct which would constitute the crime of racketeering; or
 - B. One or more of them would aid in the planning solicitation

or commission of the crime of racketeering, that is to conduct 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 violence, crimes of the first degree, and crimes involving the use of firearms, 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 July 1, 2019, and on or about June 10, 2020, at the City of Trenton, at the Township of Ewing, at the Township of Hamilton, at the Township of Lawrence, at the Township of Hopewell, all in the County of Mercer, at the Township of Willingboro, in the County of Burlington, in the State of New Jersey, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

CHARLES M. WILLIS, SHAIQUAN HEARNS, DAVION FENDERSON, RICHARD FENDERSON, BOBBY HOOD, DION BATTLE, YAHONATAN SALTER, SHAWN ANDERSON, ZAIRE JACKSON, DAVID WILLIAMS, DAHQUAY POOLE, TRE WHETSTONE, CHARLES J. WILLIS, FREDRICK EUTSEY, JOHN COLVIN JR., LAURENCE GREEN, BRIANA BLUE, TAMEKA FLEMMING, ASHLEY JONES, and BRITTANI MIMS, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members or associates of the enterprise, but not as defendants

herein, did constitute an "enterprise" within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, or associates thereof, which, among other names, members or associates thereof are known as the "Get Money Boys" gang ("GMB"), engaged in, or the activities of which affected trade or commerce.

THE PURPOSES OF THE ENTERPRISE

At all times relevant to this Indictment, the GMB was a criminal enterprise operating out of the Oakland Street Apartments and the surrounding areas in Trenton, New Jersey. The GMB gang constitute an ongoing criminal enterprise whose members and associates function as a continuing unit for the common purpose of achieving the objectives of the enterprise. It was part of the conspiracy that the purposes of the enterprise would include the following:

A. Collectively generating income on behalf of and for the benefit of the enterprise members and associates through violations of the laws of the State of New Jersey, including the commission of the crimes of distribution of controlled dangerous substances and leader of a narcotics trafficking network;

B. Accomplishing the goals of the enterprise through the collection of proceeds generated through the commission of various crimes from members of the enterprise, said proceeds to be utilized for the advancement and benefit of the enterprise and/or its leaders;

C. Protecting the perpetuation of the enterprise by

shielding its operation from detection by law enforcement authorities by, among other things, concealing the means and locations from which it conducts its affairs, using wireless telephones, using associates to lease and/or buy vehicles to conceal the drivers of the vehicles, using a variety of locations, residences, or motor vehicles for storage or delivery of controlled dangerous substances, identifying individuals in or around GMB "turf" who have cooperated with law enforcement in the past to silence them through the commission of the crimes of murder and aggravated assault while possessing firearms to use against the person and property of others.

D. Obtaining and storing community guns to be used among the enterprise members for protection from rival gangs and to use against anyone deemed to be a threat to the enterprise.

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 the enterprise during the relevant time, including Murder (N.J.S.A. 2C:11-3a(1) and/or N.J.S.A. 2C:11-3a(2)); Attempted Murder (N.J.S.A. 2C:11-3a(1) and N.J.S.A. 2C:5-1); Aggravated Assault (N.J.S.A. 2C:12-1b(1)); Possession of a Weapon for an Unlawful Purpose (N.J.S.A. 2C:39-4a(1)); Transfer of Community Guns (N.J.S.A. 2C:39-4a(2)); Leader of a Narcotics Trafficking Network, (N.J.S.A. 2C:35-3); Distribution and Possession with

Intent to Distribute Controlled Dangerous Substances (N.J.S.A. 2C:35-5); Possession with Intent to Distribute Controlled Dangerous Substances within 1000 feet of School Property (N.J.S.A. 2C:35-7); Possession with Intent to Distribute Controlled Dangerous Substances within 500 feet of Public Property (N.J.S.A. 2C:35-7.1); and Conspiracy to commit these crimes (N.J.S.A. 2C:5-2), as described herein and in Counts Two, Three, Four, Five, Six, Seven, Nine, Eleven, Twelve, Thirteen, Fifteen, Sixteen, Eighteen, Nineteen, Twenty, Twenty-One, Twenty-Two, Twenty-Three, Twenty-Four, Thirty-Two, Thirty-Three, Thirty-Four, Thirty-Five, Thirty-Six, Thirty-Eight, Thirty-Nine, Forty, Forty-One, Forty-Five, Forty-Six, Forty-Seven, Fifty, Fifty-One, Fifty-Two, and Fifty-Four of this Indictment.

CHARLES M. WILLIS

did commit the racketeering conduct by engaging in and/or conspiring to commit repeated acts of Murder; Attempted Murder; Aggravated Assault; Possession of a Weapon for Unlawful Purpose; Transfer of a Community Gun; Leader of a Narcotics Trafficking Network; Distribution of Controlled Dangerous Substances; Possession with Intent to Distribute a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Two, Three, Four, Six, Seven, Nine, Fifteen, Eighteen, Nineteen, Twenty, Thirty-Two, Thirty-Three, Thirty-Four, Thirty-Five, Thirty-Eight, Thirty-Nine, Forty, and Fifty-Four of this

Indictment.

SHAIQUAN HEARNS

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Attempted Murder; Aggravated Assault; Transfer of a Community Gun; and Possession of a Weapon for an Unlawful Purpose; Distribution of Controlled Dangerous Substances; which racketeering conduct is the subject of Counts Two, Three, Four, Five, Six, Eleven, Twelve, Thirteen, Fifteen, Eighteen, Nineteen, Twenty, Twenty-One, Twenty-Two, Twenty-Three, and Twenty-Four of this Indictment.

DAVION FENDERSON

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Attempted Murder; Aggravated Assault; and Possession of a Weapon for Unlawful Purpose; which racketeering conduct is the subject of Counts Three, Seven, Fifteen, Sixteen, Thirty-Eight, Thirty-Nine, Forty, and Forty-One of this Indictment.

RICHARD FENDERSON

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Attempted Murder; and Aggravated Assault; Distribution of Controlled Dangerous Substances; Transfer of a Community Gun; which racketeering conduct is the subject of Counts Two, Three, Six, Seven, Fifteen, Thirty-Eight, Thirty-Nine, and Forty of this Indictment.

BOBBY HOOD

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Attempted Murder; Aggravated Assault; and Possession of a Weapon for Unlawful Purpose; which racketeering conduct is the subject of Counts Three, Four, Thirty-Two, Thirty-Three, Thirty-Four, and Thirty-Five of this Indictment.

DION BATTLE

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Attempted Murder; Aggravated Assault; and Possession of a Weapon for Unlawful Purpose; which racketeering conduct is the subject of Counts Four, Five, Eighteen, Nineteen, Twenty, Twenty-One, Twenty-Two, Twenty-Three, and Twenty-Four of this Indictment.

YAHONATAN SALTER

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Attempted Murder; Aggravated Assault; Distribution of Controlled Dangerous Substances; Possession with Intent to Distribute a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance within 1000 Feet of School Property; Possession with Intent to Distribute a Controlled Dangerous Substance within 500 Feet of Public Property; which racketeering conduct is the subject of Counts Two, Four, Eighteen,

Nineteen, Twenty, Twenty-One, Twenty-Two, Forty-Five, Forty-Six, and Forty-Seven of this Indictment.

SHAWN ANDERSON

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Attempted Murder; Aggravated Assault; and Possession of a Weapon for Unlawful Purpose; which racketeering conduct is the subject of Counts Four, Thirty-Two, Thirty-Three, Thirty-Four, and Thirty-Five of this Indictment.

ZAIRE JACKSON

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Attempted Murder; Aggravated Assault; Transfer of a Community Gun; and Possession of a Weapon for Unlawful Purpose; which racketeering conduct is the subject of Counts Four, Six, Thirty-Two, Thirty-Three, Thirty-Four, and Thirty-Five of this Indictment.

DAVID WILLIAMS

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Attempted Murder; Aggravated Assault; Transfer of a Community Gun; and Possession of a Weapon for Unlawful Purpose; which racketeering conduct is the subject of Counts Four, Six, Thirty-Two, Thirty-Three, Thirty-Four, and Thirty-Five of this Indictment.

DAHQUAY POOLE

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Murder; Aggravated Assault; Transfer of a Community Gun; and Possession of a Weapon for Unlawful Purpose; which racketeering conduct is the subject of Counts Four, Six, and Thirty-Six of this Indictment.

TRE WHETSTONE

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances; Transfer of a Community Gun; Possession with Intent to Distribute a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Two, Six, and Fifty-Four of this Indictment.

CHARLES J. WILLIS

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances; and Possession with Intent to Distribute a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Two and Fifty-Four of this Indictment.

FREDRICK EUTSEY

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances; which racketeering conduct is the subject of Count Two of this Indictment.

JOHN COLVIN JR.

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances; which racketeering conduct is the subject of Count Two of this Indictment, as well as other prior conduct.

LAURENCE GREEN

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances; Possession with Intent to Distribute Controlled Dangerous Substances; and Possession with Intent to Distribute Controlled Dangerous Substances within 500 Feet of Public Property; which racketeering conduct is the subject of Counts Two, Fifty, Fifty-One, and Fifty-Two of this Indictment.

BRIANA BLUE

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances; and Possession with Intent to Distribute a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Two and Fifty-Four of this Indictment.

TAMEKA FLEMMING

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Receipt or Transfer of a Community Gun; which racketeering conduct is the subject of Counts Five and Twenty-Four of this Indictment.

ASHLEY JONES

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances; which racketeering conduct is the subject of Count Two of this Indictment.

BRITTANI MIMS

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances; which racketeering conduct is the subject of Count Two of this Indictment.

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

COUNT TWO

(Conspiracy - Second Degree)

CHARLES M. WILLIS

SHAIQUAN HEARNS

RICHARD FENDERSON

TRE WHETSTONE

YAHONATAN SALTER

CHARLES J. WILLIS

FREDRICK EUTSEY

JOHN COLVIN JR.

LAURENCE GREEN

BRIANA BLUE

ASHLEY JONES

and

BRITTANI MIMS

who are named as defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about July 1, 2019, and on or about June 10, 2020, at the City of Trenton, at the Township of Hamilton, at the Township of Lawrence, at the Township of Hopewell, all in the County of Mercer, at the Township of Willingboro, in the County of Burlington, 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:

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

2. Knowingly or purposely distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3);

3. Knowingly or purposely distribute a controlled dangerous substance, that is, suboxone, a Schedule III narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(13);

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

(Conspiracy - First Degree)

CHARLES M. WILLIS

DAVION FENDERSON

SHAIQUAN HEARNS

RICHARD FENDERSON

and

BOBBY HOOD

who are named as defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about September 1, 2019, and on or about December 27, 2019, at the City of Trenton, at the Township of Ewing, both in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of murder, did agree together 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 cause the death of M.B., and/or did cause serious bodily injury resulting in the death of M.B., contrary to the provisions of N.J.S.A. 2C:11-3a(1) and/or N.J.S.A. 2C:11-3a(2);

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 FOUR

(Conspiracy - First Degree)

CHARLES M. WILLIS

SHAIQUAN HEARNS

DION BATTLE

YAHONATAN SALTER

SHAWN ANDERSON

BOBBY HOOD

ZAIRE JACKSON

DAVID WILLIAMS

and

DAHQUAY POOLE

who are named as defendants herein, and other persons whose identities are unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about February 12, 2020, and on or about May 19, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of murder, aggravated assault, possession of a weapon for an unlawful purpose, did agree together 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. Purposely or knowingly cause the death of J.B., contrary to the provisions for N.J.S.A. 2C:11-3a(1).

2. Purposely or knowingly cause the death of I.G., contrary to the provisions for N.J.S.A. 2C:11-3a(1).

3. Purposely or knowingly cause the death of J.M., contrary to the provisions for N.J.S.A. 2C:11-3a(1).

4. Purposely did attempt to cause serious bodily injury to J.B., I.G., and/or J.M., while committing said crime Shaiquan Hearn and/or Dion Battle used a firearm, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, contrary to the provisions of N.J.S.A. 2C:12-1b(1).

5. Knowingly did possess a certain weapon, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(1).

6. Purposely or knowingly cause the death of Victim #2, contrary to the provisions for N.J.S.A. 2C:11-3a(1).

7. Purposely or knowingly cause the death of Victim #3, contrary to the provisions for N.J.S.A. 2C:11-3a(1) and N.J.S.A. 2C:5-1.

8. Purposely did attempt to cause serious bodily injury to Victim #2 and/or Victim #3, while committing said crime Charles M. Willis, Shawn Anderson, Bobby Hood, Zaire Jackson, and/or David Williams used firearms, contrary to the provisions of N.J.S.A. 2C:12-1b(1).

9. Knowingly did possess a certain weapon, that is, one Polymer 80 handgun, one silver revolver, and/or three other unknown firearms, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(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 FIVE

(Conspiracy - Second Degree)

SHAIQUAN HEARNS

DION BATTLE

and

TAMEEKA FLEMMING

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of unlawful possession, receipt, or transfer of a community gun, and tampering with physical evidence did agree together 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 possess, receive, and/or transfer a community gun, with the purpose of engaging in criminal activity, and/or using it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(2).

2. Believing that an official proceeding or investigation was pending or about to be instituted, knowingly did conceal, alter, destroy, or remove any article, object, record, document, or other thing of physical substance, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, identification

number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, with the purpose to impair its verity or availability in such proceeding or investigation, contrary to the provisions of N.J.S.A. 2C:28-6a(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 SIX

(Conspiracy - Second Degree)

CHARLES M. WILLIS

SHAIQUAN HEARNS

ZAIRE JACKSON

DAVID WILLIAMS

RICHARD FENDERSON

TRE WHETSTONE

and

DAHQUAY POOLE

who are named as defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about October 1, 2019, and on or about June 5, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of unlawful possession, receipt, or transfer of a community gun, did agree together 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 did possess, receive, and/or transfer a community gun, with the purpose of engaging in criminal activity, and/or using it unlawfully against the person or property

of another, contrary to the provisions of N.J.S.A. 2C:39-4a(2).

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 SEVEN

(Conspiracy - First Degree)

CHARLES M. WILLIS

DAVION FENDERSON

and

RICHARD FENDERSON

who are named as defendants herein, and other persons whose identities are known to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about May 22, 2020, and on or about June 3, 2020, at the City of Trenton, at the Township of Ewing, both in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of murder and aggravated assault, did agree together 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. Purposely or knowingly cause the death of Victim #4, contrary to the provisions of N.J.S.A. 2C:11-3a(1).

2. Purposely attempt to cause, or cause, serious bodily injury to Victim #4, while committing said crime Davion Fenderson used a firearm, contrary to the provisions of N.J.S.A. 2C:12-1b(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 EIGHT

(Leader of Organized Crime - Second Degree)

CHARLES M. WILLIS

between on or about July 1, 2019, and on or about June 10, 2020, at the City of Trenton, at the Township of Ewing, at the Township of Hamilton, at the Township of Lawrence, all in the County of Mercer, and at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, purposely did conspire with others as an organizer, supervisor, manager, or financier, to commit a continuing series of crimes which constitute a pattern of racketeering activity under the provisions of N.J.S.A. 2C:41-1, specifically: Murder, in violation of N.J.S.A. 2C:11-3; Aggravated Assault, in violation of N.J.S.A. 2C:12-1b(1); Leader of a Narcotics Trafficking Network, in violation of N.J.S.A. 2C:35-3; Distribution of Controlled Dangerous Substances, in violation of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(1); Possession with intent to Distribute a Controlled Dangerous Substance, in violation of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(1); Possession of a Weapon for an Unlawful Purpose, in violation of N.J.S.A. 2C:39-4a(1); and/or Possession, Receipt, or Transfer of a Community Gun, in violation of N.J.S.A. 2C:39-4a(2), contrary to the provisions of N.J.S.A. 2C:5-2g, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Leader of a Narcotics Trafficking Network - First Degree)

CHARLES M. WILLIS

between on or about July 1, 2019, and on or about June 10, 2020, at the City of Trenton, in the County of Mercer, at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier, or manager, to engage for profit in a scheme or course of conduct to unlawfully manufacture, distribute, dispense, bring into or transport in this State, heroin, a Schedule I controlled dangerous substance, and/or cocaine, a Schedule II controlled dangerous substance, and/or suboxone, a Schedule III narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(13); contrary to the provisions of N.J.S.A. 2C:35-3, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Promoting Organized Street Crime - First Degree)

CHARLES M. WILLIS

between on or about July 1, 2019, and on or about June 10, 2020, at the City of Trenton, at the Township of Ewing, at the Township of Hamilton, at the Township of Lawrence, all in the County of Mercer, and at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier, or manager, to commit one or more of the crimes enumerated in N.J.S.A. 2C:33-30, specifically, Murder, in violation of N.J.S.A. 2C:11-3; Aggravated Assault, in violation of N.J.S.A. 2C:12-1b(1); Solicitation, Recruitment to Join Criminal Street Gang, in violation of N.J.S.A. 2C:33-28; Leader of a Narcotics Trafficking Network, in violation of N.J.S.A. 2C:35-3; Distribution of a Controlled Dangerous Substance, in violation of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(1); Possession of a Weapon for an Unlawful Purpose, in violation of N.J.S.A. 2C:39-4a(1); Possession, Receipt, or Transfer of a Community Gun, in violation of N.J.S.A. 2C:39-4a(2), and/or Unlawful Possession of a Weapon, in violation of N.J.S.A. 2C:39-5, contrary to the provisions of N.J.S.A. 2C:33-30, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Attempted Murder - First Degree)

SHAIQUAN HEARNS

on or about September 17, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of Victim #1, contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Aggravated Assault - Second Degree)

SHAIQUAN HEARNS

on or about September 17, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to Victim #1, while committing said crime Shaiquan Hearns used a firearm, that is, a handgun, 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 THIRTEEN

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

SHAIQUAN HEARNS

on or about September 17, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a handgun, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(1), and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Unlawful Possession of a Weapon - Second Degree)

SHAIQUAN HEARNS

on or about September 17, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a handgun, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Murder - First Degree)

DAVION FENDERSON
CHARLES M. WILLIS
SHAIQUAN HEARNS
and
RICHARD FENDERSON

on or about December 27, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did cause the death of M.B., and/or did cause serious bodily injury resulting in the death of M.B., contrary to the provisions of N.J.S.A. 2C:11-3a(1) and/or N.J.S.A. 2C:11-3a(2), 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 Weapon for an Unlawful Purpose - Second Degree)

DAVION FENDERSON

on or about December 27, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a handgun, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(1), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Unlawful Possession of a Weapon - Second Degree)

DAVION FENDERSON

on or about December 27, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a handgun, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Attempted Murder - First Degree)

CHARLES M. WILLIS

SHAIQUAN HEARNS

DION BATTLE

and

YAHONATAN SALTER

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of J.B., contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:5-1, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Attempted Murder - First Degree)

CHARLES M. WILLIS

SHAIQUAN HEARNS

DION BATTLE

and

YAHONATAN SALTER

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of I.G., contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:5-1, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Aggravated Assault - Second Degree)

CHARLES M. WILLIS

SHAIQUAN HEARNS

DION BATTLE

and

YAHONATAN SALTER

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to J.B. and/or I.G., while committing said crime Shaiquan Hearns and Dion Battle used a firearm, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, given identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, contrary to the provisions of N.J.S.A. 2C:12-1b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Attempted Murder - First Degree)

SHAIQUAN HEARNS

DION BATTLE

and

YAHONATAN SALTER

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of J.M., contrary to the provisions for N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:5-1, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Aggravated Assault - Second Degree)

SHAIQUAN HEARNS

DION BATTLE

and

YAHONATAN SALTER

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to J.M., while committing said crime Shaiquan Hearn and Dion Battle used a firearm, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, given identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, contrary to the provisions of N.J.S.A. 2C:12-1b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

SHAIQUAN HEARNS

and

DION BATTLE

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, given identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Possession, Receipt, or Transfer
of Community Guns - Second Degree)

SHAIQUAN HEARNS

DION BATTLE

and

TAMEKA FLEMMING

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess, receive, and/or transfer community guns, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, given identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, with the purpose of engaging in criminal activity, and/or using it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Unlawful Possession of a Weapon - Second Degree)

SHAIQUAN HEARNS

DION BATTLE

and

TAMEKA FLEMMING

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, given identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Unlawful Possession of a Firearm without a
Serial Number - Third Degree)

SHAIQUAN HEARNS

DION BATTLE

and

TAMEKA FLEMMING

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver, as defined in N.J.S.A. 2C:39-9k, which was not imprinted with a serial number registered with a federally licensed manufacturer, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, given identification number NJ200373-30, contrary to the provisions of N.J.S.A. 2C:39-3n, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Unlawful Possession of a Large Capacity
Ammunition Magazine - Fourth Degree)

SHAIQUAN HEARNS

DION BATTLE

and

TAMEKA FLEMMING

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3j, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Hindering Apprehension or Prosecution of Self - Third Degree)

SHAIQUAN HEARNS

DION BATTLE

and

YAHONATAN SALTER

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose to hinder their own apprehension, prosecution, conviction, or punishment did suppress, by way of concealment or destruction, any evidence of the crime or tamper with a document or other source of information, regardless of its admissibility in evidence, which might aid in their discovery or apprehension or in the lodging of a charge against them, contrary to the provisions of N.J.S.A. 2C:29-3b(1), and against the peace of this State, government and dignity of the same.

COUNT TWENTY-NINE

(Hindering Apprehension or Prosecution of
Another Person - Third Degree)

TAMEKA FLEMMING

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose to hinder the apprehension, prosecution, conviction, or punishment of another person, that is, Shaiquan Hearn and/or Dion Battle; did harbor or conceal the said Shaiquan Hearn and/or Dion Battle; did suppress, by way of concealment or destruction, any evidence of the crime, or tamper with a document or other source of information, regardless of its admissibility in evidence, which might aid in the discovery or apprehension of such other person, and/or in the lodging of a charge against the said Shaiquan Hearn and/or Dion Battle, and/or did give false information to a law enforcement officer, contrary to the provisions of N.J.S.A. 2C:29-3a(1), N.J.S.A. 2C:29-3a(3), N.J.S.A. 2C:29-3a(7), and against the peace of this State, government and dignity of the same.

COUNT THIRTY

(Tampering with Physical Evidence - Fourth Degree)

SHAIQUAN HEARNS

DION BATTLE

and

TAMEKA FLEMMING

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, knowingly did conceal, alter, destroy, or remove any article, object, record, document, or other thing of physical substance, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, given identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, with the purpose to impair its verity or availability in such proceeding or investigation, contrary to the provisions of N.J.S.A. 2C:28-6a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Obstructing the Administration of Law or Other Governmental
Function - Fourth Degree)

TAMEKA FLEMMING

between on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did obstruct, impair or prevent the administration of law or some other governmental function thereby obstructing the investigation or detection of a crime or the prosecution of a person for a crime or purposely did prevent or attempted to prevent New Jersey State Police Detective Sergeant Anthony Zoppina, and/or Trenton Police Officer Ricardo Ramos, and/or Trenton Police Detective Sergeant Yllanda Ward, all of whom are public servants, from lawfully performing an official function by means of flight, and/or physical interference or obstacle, thereby obstructing the detection or investigation of a crime or the prosecution of a person for a crime, contrary to the provisions of N.J.S.A. 2C:29-1a, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Attempted Murder - First Degree)

CHARLES M. WILLIS

SHAWN ANDERSON

BOBBY HOOD

ZAIRE JACKSON

and

DAVID WILLIAMS

on or about May 1, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of Victim #2, contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:5-1, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Attempted Murder - First Degree)

CHARLES M. WILLIS

SHAWN ANDERSON

BOBBY HOOD

ZAIRE JACKSON

and

DAVID WILLIAMS

on or about May 1, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of Victim #3, contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:5-1, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Aggravated Assault - Second Degree)

CHARLES M. WILLIS

SHAWN ANDERSON

BOBBY HOOD

ZAIRE JACKSON

and

DAVID WILLIAMS

on or about May 1, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly, purposely, and/or under circumstances manifesting extreme indifference to the value of human life recklessly, caused serious bodily injury to Victim #2 and/or Victim #3, while committing said crime Charles M. Willis, Shawn Anderson, Bobby Hood, Zaire Jackson, and David Williams did use a firearm, contrary to the provisions of N.J.S.A. 2C:12-1b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

CHARLES M. WILLIS

SHAWN ANDERSON

BOBBY HOOD

ZAIRE JACKSON

and

DAVID WILLIAMS

on or about May 1, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a handgun, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

DAHQUAY POOLE

between on or about May 1, 2020, and on or about May 22, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a Polymer 80 handgun, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SEVEN

(Unlawful Possession of a Weapon - Second Degree)

CHARLES M. WILLIS

SHAWN ANDERSON

BOBBY HOOD

ZAIRE JACKSON

and

DAVID WILLIAMS

on or about May 1, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a handgun, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-EIGHT

(Attempted Murder - First Degree)

DAVION FENDERSON

CHARLES M. WILLIS

and

RICHARD FENDERSON

between, on or about May 22, 2020, and on or about June 3, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause the death of Victim #4, contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:5-1, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Aggravated Assault - Second Degree)

DAVION FENDERSON

CHARLES M. WILLIS

and

RICHARD FENDERSON

on or about June 3, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly, purposely, and/or under circumstances manifesting extreme indifference to the value of human life recklessly, caused serious bodily injury to Victim #4, Victim #5, Victim #6, and/or Victim #7, while committing said crime Davion Fenderson used a firearm, that is, a handgun, contrary to the provisions of N.J.S.A. 2C:12-1b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Aggravated Assault - Second Degree)

DAVION FENDERSON

CHARLES M. WILLIS

and

RICHARD FENDERSON

on or about June 3, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to Victim #8 and/or Victim #9, while committing said crime Davion Fenderson used a firearm, that is, a handgun, contrary to the provisions of N.J.S.A. 2C:12-1b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-ONE

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

DAVION FENDERSON

on or about June 3, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a handgun, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(1), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

(Unlawful Possession of a Weapon - Second Degree)

DAVION FENDERSON

on or about June 3, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a handgun, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-THREE

(Solicitation or Recruitment of a Juvenile to Join
a Criminal Street Gang - Second Degree)

CHARLES M. WILLIS

SHAIQUAN HEARNS

and

DAVID WILLIAMS

between on or about September 1, 2019, and on or about June 5, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did solicit, recruit, coerce, or threaten a person under 18 years of age to join or actively participate in a criminal street gang with the knowledge or purpose that the juvenile who was solicited or recruited would promote, further, assist, plan, aid, agree, or attempt to aid in the commission of criminal conduct by a member of a criminal street gang, contrary to the provisions of N.J.S.A. 2C:33-28a, N.J.S.A. 2C:33-28d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

YAHONATAN SALTER

on or about August 24, 2019, at the City of Trenton, in the County of Mercer, 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 FORTY-FIVE

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

YAHONATAN SALTER

on or about August 24, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SIX

(Possession with Intent to Distribute a Controlled Dangerous Substance within 500 Feet of Certain Public Property - Second Degree)

YAHONATAN SALTER

on or about August 24, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of the Delaware Raritan Canal Path, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SEVEN

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

YAHONATAN SALTER

on or about August 24, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Trinity Cathedral Academy, which is owned or leased to the Trenton Board of Education, and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-EIGHT

(Possession of a Controlled Dangerous Substance - Third Degree)

LAURENCE GREEN

on or about May 19, 2020, at the City of Trenton, in the County of Mercer, 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 FORTY-NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

LAURENCE GREEN

on or about May 19, 2020, at the City of Trenton, in the County of Mercer, 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 against the peace of this State, the government and dignity of the same.

COUNT FIFTY

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

LAURENCE GREEN

on or about May 19, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-ONE

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

LAURENCE GREEN

on or about May 19, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-TWO

(Possession with Intent to Distribute a Controlled Dangerous Substance within 500 Feet of Certain Public Property - Second Degree)

LAURENCE GREEN

on or about May 19, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin and/or cocaine, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of the Oakland Street Apartments, a public housing facility, contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

TRE WHETSTONE

on or about May 31, 2020, at the Township of Hamilton, in the County of Mercer, 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 FIFTY-FOUR

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

CHARLES M. WILLIS

TRE WHETSTONE

CHARLES J. WILLIS

and

BRIANA BLUE

between on or about May 30, 2020, and on or about May 31, 2020, at the City of Trenton, in the Township of Hamilton, both in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FIVE

(Unlawful Possession of a Weapon - First Degree)

SHAIQUAN HEARNS

between on or about September 17, 2019, and on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Second Degree Aggravated Assault in Mercer County on Indictment 14-04-00424-I, knowingly did possess a certain weapon, that is, an unknown handgun; and/or a 9mm Luger caliber Polymer 80 semiautomatic pistol, identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2C:39-5j, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SIX

(Unlawful Possession of a Weapon - First Degree)

DION BATTLE

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of First Degree Robbery in Mercer County on Indictment 10-05-00536-I, knowingly did possess a certain weapon, that is, a 9mm Luger caliber Polymer 80 semiautomatic pistol, given identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2C:39-5j, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SEVEN

(Certain Persons Not to Have Weapons - Second Degree)

SHAIQUAN HEARNS

between on or about September 17, 2019, and on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Second Degree Aggravated Assault in Mercer County on Indictment 14-04-00424-I, did purchase, own, possess or control the following firearms: an unknown handgun; and/or a 9mm Luger caliber Polymer 80 semiautomatic pistol, identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-EIGHT

(Certain Persons Not to Have Weapons - Second Degree)

DAVION FENDERSON

between on or about December 27, 2019, and on or about June 3, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Third Degree Burglary in Mercer County on Indictment 13-01-00179-I, did purchase, own, possess or control a firearm, that is, a handgun, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-NINE

(Certain Persons Not to Have Weapons - Second Degree)

DION BATTLE

on or about February 12, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of First Degree Robbery in Mercer County on Indictment 10-05-00536-I, did purchase, own, possess or control the following firearms: a 9mm Luger caliber Polymer 80 semiautomatic pistol, identification number NJ200373-30; and/or a 9mm Luger caliber Smith & Wesson semiautomatic pistol, serial number HVD6415, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY

(Certain Persons Not to Have Weapons - Second Degree)

CHARLES M. WILLIS

on or about May 1, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime(s) of Third Degree Terroristic Threats in Mercer County on Indictment Number 11-06-00555-I, and/or Second Degree Unlawful Possession of a Weapon in Mercer County on Indictment Number 12-03-00270-I, and/or Second Degree Unlawful Possession of a Weapon in Mercer County on Indictment Number 13-04-00421-I, did purchase, own, possess or control a firearm, that is, a handgun, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

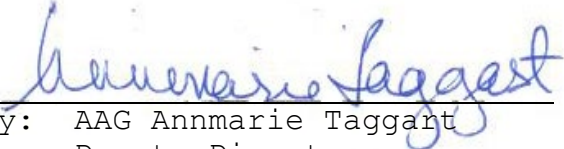
COUNT SIXTY-ONE

(Certain Persons Not to Have Weapons - Second Degree)

DAVID WILLIAMS

on or about May 1, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime(s) of Third Degree Distribution/ Possession with the Intent to Distribute a Controlled Dangerous Substance within 1,000 Feet of School Property in Mercer County on Accusation Number 12-05-00296-A, and/or Second Degree Unlawful Possession of a Weapon in Mercer County on Indictment Number 14-04-00486-I, did purchase, own, possess or control a firearm, that is, a handgun, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

AAG Lyndsay Ruotolo
Director
Division of Criminal Justice


By: AAG Anmarie Taggart
Deputy Director
Division of Criminal Justice

A TRUE BILL:

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Date: 7/23/2021