

Boonton, in the County of Morris, at the Township of Clinton, in the County of Hunterdon, at the Borough of Bernardsville, and at the Borough of Watchung, in the County of Somerset, at the Township of Berkeley Heights, in the County of Union, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Theft and Burglary, did agree together that:

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

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

1. Knowingly did unlawfully take or exercise control over the moveable property of another, that is, money and property having a value of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:20-2; and

2. Knowingly did enter a structure of another with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2.

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 TWO

(Promoting Organized Street Crime - First Degree)

KEITH PERRY

between on or about October 21, 2020, and on or about March 27, 2021, at the Township of Montclair, at the Township of Verona, at the Township of Cedar Grove, and at the Borough of North Caldwell, in the County of Essex, at the City of Englewood, at the Borough of Paramus, at the Township of Teaneck, at the Township of Washington, and at the Borough of Montvale, in the County of Bergen, at the Township of Boonton, in the County of Morris, at the Township of Clinton, in the County of Hunterdon, at the Borough of Bernardsville, and at the Borough of Watchung, in the County of Somerset, at the Township of Berkeley Heights, in the County of Union, 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, Burglary, in violation of N.J.S.A. 2C:18-2, 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 THREE

(Burglary - Second Degree)

KEITH PERRY

on or about December 23, 2020, at the City of Englewood, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 320 Lydecker Street, Englewood, with the purpose to commit an offense therein, and in the course of committing said offense purposely or knowingly threatened to inflict bodily injury on another, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same

COUNT FOUR

(Burglary - Third Degree)

KEITH PERRY

on or about October 21, 2020, at the Township of Montclair, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 115 Heller Way, Montclair, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Burglary - Third Degree)

KEITH PERRY

on or about December 2, 2020, at the Township of Verona, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 14 Fellswood Drive, Verona, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Burglary - Third Degree)

KEITH PERRY

on or about December 23, 2020, at the Borough of Paramus, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 301 Wedgewood Drive, Paramus, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Burglary - Third Degree)

KEITH PERRY

on or about December 23, 2020, at the Township of Teaneck, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 326 Winthrop Road, Teaneck, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Burglary - Third Degree)

KEITH PERRY

on or about December 23, 2020, at the Township of Teaneck, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 629 Winthrop Road, Teaneck, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Burglary - Third Degree)

KEITH PERRY

on or about December 24, 2020, at the Township of Washington, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 15 Spice Drive, Washington Township, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Burglary - Third Degree)

KEITH PERRY

on or about January 4, 2021, at the Township of Cedar Grove, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 18 Patten Terrace, Cedar Grove, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Burglary - Third Degree)

KEITH PERRY

Between on or about January 14, 2021, and January 15, 2021, at the Borough of Montvale, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 7 Stembrook Road, Montvale, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Burglary - Third Degree)

KEITH PERRY

on or about January 16, 2021, at the Township of Boonton, in the County of Morris, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 39 Dogwood Lane, Parsippany, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Burglary - Third Degree)

KEITH PERRY

on or about January 22, 2021, at the Township of Clinton, in the County of Hunterdon, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 4 Pine Tree Lane, Clinton, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Burglary - Third Degree)

KEITH PERRY

on or about January 25, 2021, at the Borough of Bernardsville, in the County of Somerset, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 10-E Somerset Hill Court, Bernardsville, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Burglary - Third Degree)

KEITH PERRY

on or about January 25, 2021, at the Borough of North Caldwell, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 5 Orient Way, North Caldwell, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Burglary - Third Degree)

KEITH PERRY

on or about March 15, 2021, at the Borough of North Caldwell, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 18 Deer Trail Road, North Caldwell, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Burglary - Third Degree)

KEITH PERRY

on or about March 16, 2021, at the Township of Boonton, in the County of Morris, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 14 High Mountain Drive, Boonton, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Burglary - Third Degree)

KEITH PERRY

on or about March 24, 2021, at the Borough of Watchung, in the County of Somerset, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 170 Parlin Lane, Watchung, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Burglary - Third Degree)

KEITH PERRY

on or about March 27, 2021, at the Township of Berkeley Heights, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly did enter the structure at 20 North Road, Berkeley Heights, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Receiving Stolen Property - Second Degree)

KEITH PERRY

between on or about October 21, 2020, and on or about March 27, 2021, at the Township of Montclair, at the Township of Verona, at the Township of Cedar Grove, and at the Borough of North Caldwell, in the County of Essex, at the City of Englewood, at the Borough of Paramus, at the Township of Teaneck, at the Township of Washington, and at the Borough of Montvale, in the County of Bergen, at the Township of Boonton, in the County of Morris, at the Township of Clinton, in the County of Hunterdon, at the Borough of Bernardsville, and at the Borough of Watchung, in the County of Somerset, at the Township of Berkeley Heights, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly did receive movable property of another, that is, various articles of personal property having a value of \$75,000 or more, knowing that they had been stolen, or believing that they were probably stolen, contrary to the provisions of N.J.S.A. 2C:20-7, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Theft by Unlawful Taking - Second Degree)

KEITH PERRY

between on or about October 21, 2020, and on or about March 27, 2021, at the Township of Montclair, at the Township of Verona, at the Township of Cedar Grove, and at the Borough of North Caldwell, in the County of Essex, at the City of Englewood, at the Borough of Paramus, at the Township of Teaneck, at the Township of Washington, and at the Borough of Montvale, in the County of Bergen, at the Township of Boonton, in the County of Morris, at the Township of Clinton, in the County of Hunterdon, at the Borough of Bernardsville, and at the Borough of Watchung, in the County of Somerset, at the Township of Berkeley Heights, in the County of Union, elsewhere, and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over movable property of others, that is, various articles of personal property having a value of \$75,000 or more, with purpose to deprive them thereof,

