

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ756-21-7
Superior Court
Docket Number 21-5-64-S

STATE OF NEW JERSEY)

v.)

FERONDA SULLIVAN)

and)

ANGELIS CUMBA)

INDICTMENT

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

COUNT ONE

(Maintaining or Operating a Controlled Dangerous
Substance Production Facility - First Degree)

FERONDA SULLIVAN

and

ANGELIS CUMBA

on or about February 25, 2021, at the Township of Willingboro, in
the County of Burlington, elsewhere, and within the jurisdiction
of this Court, knowingly did maintain or operate a premises, place
or facility used for manufacturing a controlled dangerous
substance that is, cocaine, or knowingly did aid, promote or

finance or otherwise participate in the maintenance or operation of such premises, place or facility contrary to the provisions of N.J.S.A. 2C:35-4, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

FERONDA SULLIVAN

and

ANGELIS CUMBA

on or about February 25, 2021, at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine and/or fentanyl, 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 THREE

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

FERONDA SULLIVAN

and

ANGELIS CUMBA

on or about February 25, 2021, at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

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

FERONDA SULLIVAN

and

ANGELIS CUMBA

on or about February 25, 2021, at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .380 caliber Smith & Wesson semiautomatic pistol, serial number ECP2140, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Certain Persons Not to Have Weapons - Second Degree)

FERONDA SULLIVAN

on or about February 25, 2021, at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Third Degree Possession with Intent to Distribute a Controlled Dangerous Substance/Distribution of a Controlled Dangerous Substance within 1000 feet of School Property in Union County, on Accusation number UNN950600900A; and/or Third Degree Possession with Intent to Distribute a Controlled Dangerous Substance/Distribution of a Controlled Dangerous Substance in Middlesex County, on Indictment number MID970400546I; and/or First degree Attempted Murder in Ocean County, on Indictment number OCN030500576I, did purchase, own, possess, or control the following firearm: a .380 caliber Smith & Wesson semiautomatic pistol, serial number ECP2140, 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 VERONICA ALLENDE
DIRECTOR
DIVISION OF CRIMINAL JUSTICE

Lauren S. Yfantis

BY: SDAG Lauren S. Yfantis
Chief
Division of Criminal Justice

A TRUE BILL:

Foreperson

Dated: 5/5/2021

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
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STATE OF NEW JERSEY)

 v.) ORDER OF VENUE

FERONDA SULLIVAN)

 and)

ANGELIS CUMBA)

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

IT IS ORDERED on this **5th day of May, 2021**, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Burlington 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 Burlington for filing.

/s/Mary C. Jacobson
Mary C. Jacobson, A.J.S.C.