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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ588-10-17-S

Superior Court

Docket Number 10-07-00087-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

BERNARD GREEN,)
AKA "PETEY BLACK,")
AKA "T-BO")

BRUCE DUETTE,)
AKA "BLACK MAGIC,")
AKA "BLACK T-BO")

ANTHONY COLEMAN, ")
AKA "ACE")

RICHARD JENKINS,)
AKA "BANDANNA,")
AKA "POP-A-LOT")

CURTIS HAWKINS,)
AKA "LITTLE CURT,")
AKA "RABBIT")

RONALD SMITH,)
AKA "DOUBLE R")

RONALD STEVENS,)
AKA "SAUCE")

EBONY ROWELL)

JABARI CROSS,)
AKA "BD,")
AKA "BAR,")
AKA "BARI")

LEROY TUTT,)
AKA "TUTT")

DONTE ELLIS,)
AKA "CHALANT,")
AKA "NONCHALANT,")
AKA "NACHA")

ANTHONY HOWLETT,)
AKA "YAK")
KEITH PARKER,)
AKA "DROOP")
CURTIS MORGAN,)
AKA "PUD,")
AKA "FAT BOY")
ROBERT CHRISTIE,)
AKA "SNOOP.")
)

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

COUNT ONE

(Racketeering - First Degree)

BERNARD GREEN

BRUCE DUETTE

ANTHONY COLEMAN

RICHARD JENKINS

CURTIS HAWKINS

RONALD SMITH

RONALD STEVENS

EBONY ROWELL

JABARI CROSS

LEROY TUTT

DONTE ELLIS

ANTHONY HOWLETT

KEITH PARKER

and

CURTIS MORGAN

and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, all being members or associates of a criminal organization known as the Gangster Killer Bloods set of the Bloods street gang, Trenton chapter, hereinafter referred to as the Gangster Killer Bloods set, 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 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 or collection of unlawful debt, including the commission of crimes of violence, crimes of the first degree, and crimes involving the use of firearms, 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 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 or collection of an unlawful debt, including the commission of crimes of violence, crimes of the first degree, and crimes involving the use of firearms, contrary to the provisions of N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES AND PLACES

The predicate criminal activity and conspiracy occurred between on or about March 25, 2005, and on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

1. At all times relevant to this Indictment, BERNARD GREEN, BRUCE DUETTE, ANTHONY COLEMAN, RICHARD JENKINS, CURTIS HAWKINS, RONALD SMITH, RONALD STEVENS, EBONY ROWELL, JABARI CROSS, LEROY TUTT, DONTE ELLIS, ANTHONY HOWLETT, KEITH PARKER, and CURTIS MORGAN, the defendants, and others whose identities are known and unknown to the Grand Jurors, were members or associates of the Gangster Killer Bloods set. The Gangster Killer Bloods set, including its leadership, membership, and associates, constitute an "enterprise," within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, engaged in, or the

activities of which affected trade or commerce in the State of New Jersey.

THE PURPOSES OF THE ENTERPRISE

1. The purposes of the enterprise include, but are not limited to, the following:

A. Enriching the leaders, members, and associates of the set through, among other things: (i) the possession, possession with intent to distribute, and distribution of controlled dangerous substances, (ii) robberies, and (iii) the payment of dues by enterprise members; and

B. Preserving and augmenting the power, territory, and financial profits of the enterprise through murder, intimidation, violence, and threats of physical harm; and

C. Keeping victims, citizens, witnesses, and rival gang members in fear of the enterprise and its leaders, members and associates by: (i) identifying themselves as members of the enterprise, (ii) controlling geographical areas as turf of the enterprise, where rival gangs and others are prohibited from entering or committing crimes, (iii) threatening to commit and committing physical violence against victims, citizens and witnesses in order to prevent victims, citizens and witnesses from cooperating with the police and testifying against enterprise members, and (iv) threatening to commit and committing physical violence against rival gang members and members of other

sets of the Bloods street gang for infringing on the turf of the enterprise, committing acts of violence against members and associates of the enterprise, or disrespecting members and associates of the enterprise.

2. The Gangster Killer Bloods set is a subset of the Bloods Street Gang and an organized criminal group operating under an umbrella group called the United Blood Nation, which operates on the east coast of the United States. The Gangster Killer Bloods set constitutes an ongoing criminal organization whose members function as a continuing unit for a common purpose of achieving the objectives of the enterprise. The Gangster Killer Bloods set is referred to by its members as "GKB," "G-Shine" or "Shine." Gangster Killer Bloods set members identify themselves through the wearing of distinctive clothing, body tattoos, the use of hand signs, language, and graffiti.

3. At all times relevant to this Indictment, the Gangster Killer Bloods set was a criminal organization operating on the east coast of the United States. The Gangster Killer Bloods set was formed as a prison gang on Ryker's Island, New York, in the 1990's and the organization has recruited members on the east coast of the United States, including Trenton, New Jersey. The Gangster Killer Bloods set is organized under an umbrella organization called the United Blood Nation, which is responsible for coordinating activities between the Gangster Killer Bloods

set and other sets of the Bloods street gang operating on the east coast of the United States.

4. The Gangster Killer Bloods set has an organized structure, initiation procedures, ceremonies and rituals. New members are required to learn the history of the set, the constitution, pledges, loyalty oaths, and rules and regulations, often referred to as "food," in order to become full-fledged members of the enterprise. Pledges and oaths are utilized during membership ceremonies during which prospective members must declare their loyalty to the Gangster Killer Bloods set and to other members of the set. Failure to learn the history, pledges, oaths or rules and regulations or comply with the rules and regulations subjects members to discipline, which can include demotions, fines, beatings, or even death, depending upon the seriousness of the violation.

5. Members and associates of the Gangster Killer Bloods set engage in acts of violence and other crimes, including but not limited to murder, conspiracy to commit murder, attempted murder, weapons offenses, and the possession, distribution and possession with intent to distribute controlled dangerous substances. A portion of the money made from the distribution of controlled dangerous substances and other crimes is given to the enterprise to pay dues, obtain firearms for use by members of the set, obtain controlled dangerous substances for resale, provide

support for incarcerated members and their families, pay for attorneys and bail for incarcerated members, as well as to support the Gangster Killer Bloods set in other ways.

6. The Gangster Killer Bloods set uses violence as a means of recruiting new members, as a means of taking over the drug turf of rival gangs, as retribution for the disrespecting of members of the enterprise, as retribution for acts done by members of rival gangs or other sets of the Bloods street gang, as a means of intimidating witnesses, and as a means for individuals to maintain or advance their position within the gang.

THE MEANS AND METHODS OF THE ENTERPRISE

1. The means and methods by which the defendants and their co-racketeers conduct and participate in the conduct of the affairs of the Gangster Killer Bloods include:

A. Members and associates of the Gangster Killer Bloods commit, attempt to commit, and threaten to commit acts of violence, including murder, to protect and expand the enterprise's criminal operation, which includes assaults, murder, intimidation, drug trafficking and threats of violence against rival gang members, law enforcement, and potential witnesses to the crimes of the enterprise.

B. Members and associates of the Gangster Killer Bloods promote a climate of fear through intimidation, violence

and threats of violence intended to promote the authority of the Gangster Killer Bloods enterprise and insulate its members from criminal responsibility for drug distribution and violent crimes committed by members and associates of the enterprise.

C. Members of the Gangster Killer Bloods use the enterprise to murder, attempt to murder, assault, and threaten those who pose a threat to the enterprise or its members or associates or disrespect members or associates of the enterprise.

D. Members of the Gangster Killer Bloods set engage in narcotics distribution and other crimes as a means to generate income for themselves and the organization.

E. Members of the Gangster Killer Bloods collect dues to be utilized for the purchase of weapons, ammunition, and narcotics, and for use as bail money and pay for attorneys for incarcerated members and associates.

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 activity, including Murder (N.J.S.A. 2C:11-3), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Distribution of a Controlled Dangerous Substance on or within 1,000 Feet of School Property (N.J.S.A. 2C:35-7), Possession with Intent to Distribute a Controlled

Dangerous Substance on or within 1,000 Feet of School Property (N.J.S.A. 2C:35-7), Distribution of a Controlled Dangerous Substance on or within 500 Feet of Certain Public Property (N.J.S.A. 2C:35-7.1), Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 Feet of Certain Public Property (N.J.S.A. 2C:35-7.1), Possession of a Weapon for an Unlawful Purpose (N.J.S.A. 2C:39-4), Unlawful Disposition of a Firearm (N.J.S.A. 2C:39-9), Violating the Regulatory Provisions Relating to Firearms (N.J.S.A. 2C:39-10), Aggravated Assault (N.J.S.A. 2C:12-1b(1)), Terroristic Threats (N.J.S.A. 2C:12-3a), or conspiracies or attempts to commit these crimes as described herein and in this Indictment, as well as other prior conduct.

BERNARD GREEN

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Conspiracy to Commit Murder, Murder, Possession of a Weapon for an Unlawful Purpose, Possession with Intent to Distribute a Controlled Dangerous Substance, Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 Feet of School Property, Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 Feet of Certain Public Property, Attempted Murder, Aggravated Assault, Terroristic Threats, which racketeering conduct is the subject of Counts 3 - 7, 9 - 18, 20, 21, 23, 25, 28, 34, 36 - 38, and 44 - 59 of this Indictment.

BRUCE DUETTE

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Conspiracy to Commit Murder, and Possession of a Weapon for an Unlawful Purpose, which racketeering conduct is the subject of Counts 3, 4, 20, and 21 of this Indictment, as well as other prior conduct.

ANTHONY COLEMAN

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Conspiracy to Commit Murder, Murder, and Possession of a Weapon for an Unlawful Purpose, which racketeering conduct is the subject of Counts 4, 23, 36, 37, and 38 of this Indictment, as well as other prior conduct.

RICHARD JENKINS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Conspiracy to Commit Murder, Murder, and Possession of a Weapon for an Unlawful Purpose, which racketeering conduct is the subject of Counts 3, 4, 5, 6, and 7 of this Indictment.

CURTIS HAWKINS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Conspiracy to Commit Murder, Possession of a Weapon for an Unlawful Purpose, and Murder, which racketeering conduct is the subject of Counts 3, 4, 20, 21, 23,

36, 37, and 38 of this Indictment, as well as other prior conduct.

RONALD SMITH

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy and Conspiracy to Commit Murder, which racketeering conduct is the subject of Counts 3, 4, and 23 of this Indictment.

RONALD STEVENS

did commit the racketeering conduct by engaging in or conspiring to commit the crime of Conspiracy, which racketeering conduct is the subject of Count 3 of this Indictment.

EBONY ROWELL

did commit the racketeering conduct by engaging in or conspiring to commit the crime of Conspiracy, which racketeering conduct is the subject of Count 3 of this Indictment.

JABARI CROSS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy and Conspiracy to Commit Murder, which racketeering conduct is the subject of Counts 3, 4, and 23 of this Indictment.

LEROY TUTT

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Conspiracy to Commit Murder, Attempted Murder, Aggravated Assault, and Possession of a Weapon

for an Unlawful Purpose, which racketeering conduct is the subject of Counts 4, 15, 16, 17, 18, and 23 of this Indictment.

DONTE ELLIS

did commit the racketeering conduct by engaging in or conspiring to commit the crime of Conspiracy, which racketeering conduct is the subject of Count 4 of this Indictment.

ANTHONY HOWLETT

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy and Conspiracy to Commit Murder, which racketeering conduct is the subject of Counts 4 and 23 of this Indictment.

KEITH PARKER

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Conspiracy to Commit Murder, Attempted Murder, Murder, Possession of a Weapon for an Unlawful Purpose, and Conspiracy to Commit Murder, which racketeering conduct is the subject of Counts 4, 23, and 45 - 59 of this Indictment.

CURTIS MORGAN

did commit the racketeering conduct by engaging in or conspiring to commit the crime of Conspiracy, which racketeering conduct is the subject of Count 34 of this Indictment.

All in violation of N.J.S.A. 2C:5-2, 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

(Leader of Organized Crime - Second Degree)

BERNARD GREEN

between on or about March 25, 2005, and on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly 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, 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 THREE

(Conspiracy - Second Degree)

BERNARD GREEN

BRUCE DUETTE

RICHARD JENKINS

CURTIS HAWKINS

RONALD SMITH

RONALD STEVENS

EBONY ROWELL

and

JABARI CROSS

who are named as the defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about March 25, 2005, and on or about August 28, 2005, 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 distribution of a controlled dangerous substance, distribution of a controlled dangerous substance within 500 feet of certain public property, and distribution of a controlled dangerous substance within 1,000 feet of school property, 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 said crimes, that is:

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

2. Knowingly or purposely to distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of certain public property, that is, a Public Housing Facility, contrary to the provisions of N.J.S.A. 2C:35-7.1.

3. Knowingly or purposely 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 school property, contrary to the provisions of N.J.S.A. 2C:35-7.

4. Knowingly or purposely to 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).

5. Knowingly or purposely to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of certain public property, that is, a Public Housing Facility, contrary to the provisions of N.J.S.A. 2C:35-7.1.

6. Knowingly or purposely to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A.

2C:35-5a, while within 1,000 feet of school property, contrary to the provisions of N.J.S.A. 2C:35-7.

7. Knowingly or purposely to distribute a controlled dangerous substance, that is, marijuana, in a quantity of one ounce or more, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(11).

8. Knowingly or purposely to distribute a controlled dangerous substance, that is, marijuana, in a quantity of one ounce or more, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of certain public property, that is, a Public Housing Facility, contrary to the provisions of N.J.S.A. 2C:35-7.1.

9. Knowingly or purposely to distribute a controlled dangerous substance, that is, marijuana, in a quantity of one ounce or more, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of school property, contrary to the provisions of N.J.S.A. 2C:35-7.

Said crimes being committed while BERNARD GREEN, BRUCE DUETTE, RICHARD JENKINS, CURTIS HAWKINS, RONALD SMITH, RONALD STEVENS, EBONY ROWELL and JABARI CROSS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h.

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 - Second Degree)

BERNARD GREEN

BRUCE DUETTE

ANTHONY COLEMAN

RICHARD JENKINS

CURTIS HAWKINS

RONALD SMITH

LEROY TUTT

JABARI CROSS

DONTE ELLIS

ANTHONY HOWLETT

and

KEITH PARKER

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 March 25, 2005, and on or about August 28, 2005, 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 disposition of a firearm, violation of the regulatory provisions relating to firearms, unlawful possession of a weapon, and possession of a weapon for an unlawful purpose, 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 said crimes, that is:

1. Knowingly to transport, ship or dispose of a firearm without being licensed or registered to do so as provided in N.J.S.A. 2C:58-1 et seq., contrary to the provisions of N.J.S.A. 2C:39-9d.

2. Knowingly to possess a firearm 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.

3. Knowingly to receive, purchase, or otherwise acquire a handgun without being licensed as a dealer under N.J.S.A. 2C:58-1 et seq., or having first secured a permit to purchase a handgun as provided by N.J.S.A. 2C:58-3, contrary to the provisions of N.J.S.A. 2C:39-10.

4. Knowingly to possess a firearm, with purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a.

Said crimes being committed while BERNARD GREEN, BRUCE DUETTE, ANTHONY COLEMAN, RICHARD JENKINS, CURTIS HAWKINS, RONALD SMITH, LEROY TUTT, JABARI CROSS, DONTE ELLIS, ANTHONY HOWLETT and

KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h.

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 to Commit Murder - First Degree)

BERNARD GREEN

and

RICHARD JENKINS

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 16, 2005, and on or about June 20, 2005, 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 crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

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

1. Purposely or knowingly to cause the death, or serious bodily injury resulting in the death of Otis Jones, contrary to the provisions of N.J.S.A. 2C:11-3a(1) and N.J.S.A. 2C:11-3a(2).

Said crime being committed while BERNARD GREEN and RICHARD JENKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h).

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

(Murder - First Degree)

BERNARD GREEN

and

RICHARD JENKINS

on or about June 20, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did cause the death or serious bodily injury resulting in the death of Otis Jones, said crime being committed while BERNARD GREEN and RICHARD JENKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:11-3a(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

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

BERNARD GREEN

and

RICHARD JENKINS

on or about June 20, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm, with purpose to use it unlawfully against the person of Otis Jones, said crime being committed while BERNARD GREEN and RICHARD JENKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Unlawful Possession of a Weapon - Third Degree)

BERNARD GREEN

and

RICHARD JENKINS

on or about June 20, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a .40 caliber handgun, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while BERNARD GREEN and RICHARD JENKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

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

BERNARD GREEN

on or about June 22, 2005, 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, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

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

BERNARD GREEN

on or about June 22, 2005, at the City of Trenton, in the County of Mercer, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the Martin Luther King, Jr. Middle School, 800 Martin Luther King Boulevard, Trenton, New Jersey, which is owned by or leased to the Trenton Board of Education and used for school purposes, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

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

BERNARD GREEN

on or about June 22, 2005, at the City of Trenton, in the County of Mercer, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of the Donnelly Paige Homes Public Housing Project, Trenton, New Jersey, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:35-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

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

BERNARD GREEN

on or about June 22, 2005, 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, marijuana, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(12), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

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

BERNARD GREEN

on or about June 22, 2005, at the City of Trenton, in the County of Mercer, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, marijuana, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the Martin Luther King Jr. Middle School, 800 Martin Luther King Boulevard, Trenton, New Jersey, which is owned by or leased to the Trenton Board of Education and used for school purposes, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

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

BERNARD GREEN

on or about June 22, 2005, at the City of Trenton, in the County of Mercer, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, marijuana, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of the Donnelly Paige Homes Public Housing Project, Trenton, New Jersey, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3(h), contrary to the provisions of N.J.S.A. 2C:35-7.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Conspiracy to Commit Murder - First Degree)

BERNARD GREEN

and

LEROY TUTT

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, on or about July 23, 2005, 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 crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

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

1. Purposely or knowingly to cause the death, or serious bodily injury resulting in the death of Paul Jiles, also known as "P-Funk," said crime being committed while BERNARD GREEN and LEROY TUTT were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:11-3a(1) and 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 SIXTEEN

(Attempted Murder - First Degree)

BERNARD GREEN

and

LEROY TUTT

on or about July 23, 2005, 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 Paul Jiles, also known as "P-Funk," said crime being committed while BERNARD GREEN and LEROY TUTT were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:11-3, 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 SEVENTEEN

(Aggravated Assault - Second Degree)

BERNARD GREEN

and

LEROY TUTT

on or about July 23, 2005, 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 Rochelle Soloman, or knowing or purposely did cause serious bodily injury to Rochelle Soloman, or did cause the said Rochelle Soloman serious bodily injury recklessly under circumstances manifesting extreme indifference to the value of human life, said crime being committed while BERNARD GREEN and LEROY TUTT were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:12-1b(1), N.J.S.A. 2C:2-6, and N.J.S.A. 2C:2-3d, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

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

BERNARD GREEN

and

LEROY TUTT

on or about July 23, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm with purpose to use it unlawfully against the person of Paul Jiles, also known as "P-Funk," said crime being committed while BERNARD GREEN and LEROY TUTT were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Unlawful Possession of a Weapon - Third Degree)

BERNARD GREEN

and

LEROY TUTT

on or about July 23, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while BERNARD GREEN and LEROY TUTT were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Conspiracy to Commit Murder - First Degree)

BERNARD GREEN

BRUCE DUETTE

and

CURTIS HAWKINS

who are named as the defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, on or about July 27, 2005, 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 crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

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

1. Purposely or knowingly to cause the death or serious bodily injury resulting in the death of five or more unknown members of the Crips street gang located in the vicinity of 15 North Logan Avenue, Trenton, New Jersey, contrary to the provisions of N.J.S.A. 2C:11-3a(1) and N.J.S.A. 2C:11-3a(2).

Said crime being committed while BERNARD GREEN, BRUCE DUETTE and CURTIS HAWKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h.

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 TWENTY-ONE

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

BERNARD GREEN

BRUCE DUETTE

and

CURTIS HAWKINS

on or about July 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm, with purpose to use it unlawfully against the persons of five or more unknown members of the Crips street gang located in the vicinity of 15 North Logan Avenue, Trenton, New Jersey, said crime being committed while BERNARD GREEN, BRUCE DUETTE and CURTIS HAWKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Unlawful Possession of a Weapon - Third Degree)

BERNARD GREEN

BRUCE DUETTE

and

CURTIS HAWKINS

on or about July 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a handgun without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while BERNARD GREEN, BRUCE DUETTE and CURTIS HAWKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Conspiracy to Commit Murder - First Degree)

BERNARD GREEN

ANTHONY COLEMAN

CURTIS HAWKINS

RONALD SMITH

JABARI CROSS

LEROY TUTT

ANTHONY HOWLETT

and

KEITH PARKER

who are named as the defendants herein, and other persons whose identities are unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about August 27, 2005, and on or about August 28, 2005, 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 crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

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

1. Purposely or knowingly to cause the death, or serious bodily injury resulting in the death of unknown members of the Nine Trey Gangsters set of the Bloods street gang, contrary to the provisions of N.J.S.A. 2C:11-3a(1) and N.J.S.A. 2C:11-3a(2).

Said crime being committed while BERNARD GREEN, ANTHONY COLEMAN, CURTIS HAWKINS, RONALD SMITH, JABARI CROSS, LEROY TUTT, ANTHONY HOWLETT and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h.

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 TWENTY-FOUR

(Unlawful Possession of an Assault Firearm - Third Degree)

BERNARD GREEN

on or about August 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, an SKS 7.62mm assault rifle, serial number 21050148, without having first obtained a license pursuant to N.J.S.A. 2C:58-5, registered the weapon pursuant to N.J.S.A. 2C:58-12, or rendered the weapon inoperable pursuant to N.J.S.A. 2C:58-13, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5f and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

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

BERNARD GREEN

on or about August 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm, that is, an SKS 7.62mm assault rifle, serial number 21050148, with purpose to use it unlawfully against the persons of unknown members of the Nine Trey Gangsters set of the Bloods street gang, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Possession of a Prohibited
Weapon or Device - Fourth Degree)

BERNARD GREEN

on or about August 27, 2005, 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 for an SKS 7.62mm assault rifle, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, 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-SEVEN

(Unlawful Possession of a Rifle - Third Degree)

BERNARD GREEN

on or about August 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a rifle, that is, a Plainfield .30 caliber M1 Carbine, serial number 13079, without having first obtained a firearms purchaser identification card in accordance with the provisions of N.J.S.A. 2C:58-3, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5c(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

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

BERNARD GREEN

on or about August 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm, that is, a Plainfield .30 caliber M1 Carbine rifle, serial number 13079, with purpose to use it unlawfully against the persons of unknown members of the Nine Trey Gangsters set of the Bloods street gang, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Unlawful Possession of a Weapon - Third Degree)

BERNARD GREEN

on or about August 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a handgun, that is, an Intratec 9mm semi-automatic handgun, model AB10, bearing a defaced serial number, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5(b) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Possession of a Defaced Firearm - Fourth Degree)

BERNARD GREEN

on or about August 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a prohibited weapon, that is, a defaced Intratec 9 millimeter semi-automatic handgun, model AB10, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-3d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Unlawful Possession of a Weapon - Third Degree)

BERNARD GREEN

on or about August 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a HiPoint 9 millimeter semi-automatic handgun, serial number P082687, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Unlawful Possession of a Shotgun - Third Degree)

BERNARD GREEN

on or about August 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a shotgun, that is, a 12 gauge side-by-side, double-barrel, sawed-off shotgun, bearing the number 3593, without having first obtained a firearms purchaser identification card in accordance with the provisions of N.J.S.A. 2C:58-3, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5c(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-THREE

(Possession of a Prohibited Weapon - Third Degree)

BERNARD GREEN

on or about August 27, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a sawed-off shotgun, that is, a 12 gauge side-by-side, double-barrel, sawed-off shotgun, bearing the number 3593, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-3b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Conspiracy - Second Degree)

BERNARD GREEN

and

CURTIS MORGAN

between on or about August 27, 2005, and on or about August 28, 2005, 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 of a handgun, unlawful disposition of a firearm and possession of a weapon for an unlawful purpose, 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 said crimes, that is:

1. Knowingly to possess 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:39-5(b).

2. Knowingly to transport, ship, sell or dispose of a firearm without being licensed or registered to do so as provided in N.J.S.A. 2C:58-1, et seq., contrary to the provisions of N.J.S.A. 2C:39-9d.

3. Knowingly to possess a firearm, with purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a.

Said crimes being committed while BERNARD GREEN and CURTIS MORGAN were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h.

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 THIRTY-FIVE

(Solicitation, Recruitment to Join Criminal
Street Gang - Fourth Degree)

BERNARD GREEN

and

JABARI CROSS

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the knowledge or purpose that the person 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, did solicit or recruit another, that is, Richard Collins, also known as "Stoody," to join or actively participate in a criminal street gang, that is, the Gangster Killer Bloods set of the Bloods street gang, contrary to the provisions of N.J.S.A. 2C:33-28a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Conspiracy to Commit Murder - First Degree)

BERNARD GREEN

ANTHONY COLEMAN

and

CURTIS HAWKINS

who are named as the defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about August 27, 2005, and on or about August 28, 2005, 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 crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

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

1. Purposely or knowingly to cause the death, or serious bodily injury resulting in the death of Kareem

Washington, contrary to the provisions of N.J.S.A.

2C:11-3a(1) and N.J.S.A. 2C:11-3a(2).

Said crime being committed while BERNARD GREEN, ANTHONY COLEMAN, and CURTIS HAWKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h.

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 THIRTY-SEVEN

(Murder - First Degree)

BERNARD GREEN

ANTHONY COLEMAN

and

CURTIS HAWKINS

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did cause the death or serious bodily injury resulting in the death of Kareem Washington, said crime being committed while BERNARD GREEN, ANTHONY COLEMAN, and CURTIS HAWKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:11-3a(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-EIGHT

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

BERNARD GREEN

ANTHONY COLEMAN

and

CURTIS HAWKINS

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a handgun, with purpose to use it unlawfully against the person of Kareem Washington, said crime being committed while BERNARD GREEN, ANTHONY COLEMAN and CURTIS HAWKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a 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

(Unlawful Possession of a Weapon - Third Degree)

BERNARD GREEN

ANTHONY COLEMAN

and

CURTIS HAWKINS

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a handgun, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while BERNARD GREEN, ANTHONY COLEMAN and CURTIS HAWKINS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5b and 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)

ROBERT CHRISTIE

on or about August 28, 2005, 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 another, that is, CURTIS HAWKINS, or members of the said CURTIS HAWKINS' family residing at 214 Brunswick Avenue, Trenton, New Jersey, said crime being committed while ROBERT CHRISTIE was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:12-1b(1) and 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)

ROBERT CHRISTIE

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm with purpose to use it unlawfully against the person or property of CURTIS HAWKINS, or members of the said CURTIS HAWKINS' family residing at 214 Brunswick Avenue, Trenton, New Jersey, said crime being committed while ROBERT CHRISTIE was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

(Unlawful Possession of a Weapon - Third Degree)

ROBERT CHRISTIE

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a handgun, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while ROBERT CHRISTIE was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, 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

(Terroristic Threats - Third Degree)

ROBERT CHRISTIE

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did threaten to commit a crime of violence against mothers or grandmothers of members of the Gangster Killer Bloods set of the Bloods street gang, with purpose to terrorize BERNARD GREEN, or in reckless disregard of such risk, said crime being committed while ROBERT CHRISTIE was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provision of N.J.S.A. 2C:12-3a, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FOUR

(Terroristic Threats - Third Degree)

BERNARD GREEN

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did threaten to commit a crime of violence, that is, to kill ROBERT CHRISTIE's mother, with purpose to terrorize ROBERT CHRISTIE, or in reckless disregard of such risk, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provision of N.J.S.A. 2C:12-3a, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FIVE

(Conspiracy to Commit Murder - First Degree)

BERNARD GREEN

and

KEITH PARKER

who are named as the defendants herein, and other persons whose identities are unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, on or about August 28, 2005, 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 crime of murder, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime; or

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

1. Purposely or knowingly to cause the death, or serious bodily injury resulting in the death of Joseph James, also known as "Hell Rell," contrary to the provisions of N.J.S.A. 2C:11-3a(1) and N.J.S.A. 2C:11-3a(2).

Said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h.

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 FORTY-SIX

(Attempted Murder - First Degree)

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, 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 Michael Cadlett, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, 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 FORTY-SEVEN

(Attempted Murder - First Degree)

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, 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 Hakeem Joseph Brooks, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, 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 FORTY-EIGHT

(Attempted Murder - First Degree)

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, 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 Andre Little, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, 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 FORTY-NINE

(Attempted Murder - First Degree)

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, 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 Jabrel Abdullah, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, 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 FIFTY

(Attempted Murder - First Degree)

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, 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 Troy Carter, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, 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 FIFTY-ONE

(Attempted Murder - First Degree)

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, 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 Naquan Bethea, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, 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 FIFTY-TWO

(Murder - First Degree)

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did cause the death or serious bodily injury resulting in death of Sharee Voorhees, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:11-3a(1), N.J.S.A. 2C:11-3a(2), N.J.S.A. 2C:2-6, and N.J.S.A. 2C:2-3d, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-THREE

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

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm with purpose to use it unlawfully against the person of Joseph James, also known as "Hell Rell," said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FOUR

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

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm with purpose to use it unlawfully against the person of Michael Cadlett, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FIVE

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

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm with purpose to use it unlawfully against the person of Hakeem Joseph Brooks, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SIX

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

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm with purpose to use it unlawfully against the person of Andre Little, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SEVEN

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

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm with purpose to use it unlawfully against the person of Jabrel Abdullah, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-EIGHT

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

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm with purpose to use it unlawfully against the person of Troy Carter, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-NINE

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

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a firearm with purpose to use it unlawfully against the person of Naquan Bethea, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY

(Unlawful Possession of a Weapon - Third Degree)

BERNARD GREEN

and

KEITH PARKER

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a handgun without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, said crime being committed while BERNARD GREEN and KEITH PARKER were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-5b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-ONE

(Hindering Apprehension or Prosecution - Third Degree)

BERNARD GREEN

and

EBONY ROWELL

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to hinder the detention, apprehension, prosecution, conviction or punishment of KEITH PARKER for an offense, that is, murder or attempted murder, both crimes of the first degree, did harbor or conceal the said KEITH PARKER, or did provide or aid in providing transportation, disguise or other means of avoiding discovery or apprehension or effecting the escape of said KEITH PARKER, said crime being committed while BERNARD GREEN and EBONY ROWELL were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provision of N.J.S.A. 2C:29-3a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-TWO

(Eluding - Third Degree)

BERNARD GREEN

RONALD SMITH

and

DONTE ELLIS

on or about August 28, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, while operating a motor vehicle on a street or highway, knowingly did flee or attempt to elude a police officer after having received a signal from such officer to bring the vehicle to a full stop, said crime being committed while BERNARD GREEN, RONALD SMITH and DONTE ELLIS were knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provision of N.J.S.A. 2C:29-2b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-THREE

(Possession of a Weapon by Certain Persons - Second Degree)

BERNARD GREEN

on or about June 20, 2005, 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 Aggravated Assault with a Weapon on Mercer County Indictment MER020100107I, did possess or control a firearm, that is, the handgun used in the murder of Otis Jones, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-7b(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-FOUR

(Possession of a Weapon by Certain Persons - Second Degree)

RICHARD JENKINS

on or about June 20, 2005, 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 Controlled Dangerous Substances Near or On School Property on Mercer County Accusation MER040700636A, did possess or control a firearm, that is, the handgun used in the murder of Otis Jones, said crime being committed while RICHARD JENKINS was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-7b(1), and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-FIVE

(Possession of a Weapon by Certain Persons - Second Degree)

BERNARD GREEN

on or about July 23, 2005, 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 Aggravated Assault with a Weapon on Mercer County Indictment MER020100107I, did possess or control a firearm, that is, the handgun used in the shooting of Rochelle Soloman, said crime being committed while BERNARD GREEN was knowingly involved in criminal street gang related activity as defined in N.J.S.A. 2C:44-3h, contrary to the provisions of N.J.S.A. 2C:39-7b(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

