

FILED

JUN 27 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

STATE GRAND JURY NUMBER SGJ639-13-6

Superior Court
Docket Number 13-06-00123-8

STATE OF NEW JERSEY)

v.)

INDICTMENT

JOHNNY COBB)

NURLIN WRIGHT)

AVERY JACKSON)

OKEE WADE)

DEMETRIOUS JORDAN)

QUANMIK WELLS)

JEFFREY GRIMES)

HAVERTON BANKS)

ESTERLIN SAMUEL)

WAYNE SETTLE)

JOSHUA MAZYCK)

NATHIFA BEMBREY)

ZULIKA HOSTEN)

PAUL WINSTON)

ORQUIDA WADE)

DARRELL RICHARDSON)

JAVON WALKER)

SHANTE CARPENTER)

NICKECHA ROBINSON)
CATHERINE KENNEDY)
DASHAWN LYNCH)
JULIUS ANDERSON)
RAYMOND SPRINGS)

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

COUNT ONE

(Racketeering - Second Degree)

JOHNNY COBB

NURLIN WRIGHT

AVERY JACKSON

OKEE WADE

DEMETRIOUS JORDAN

QUANMIK WELLS

JEFFREY GRIMES

HAVERTON BANKS

ESTERLIN SAMUEL

WAYNE SETTLE

JOSHUA MAZYCK

NATHIFA BEMBREY

ZULIKA HOSTEN

PAUL WINSTON

ORQUIDA WADE
DARRELL RICHARDSON
JAVON WALKER
SHANTE CARPENTER
NICKECHA ROBINSON
CATHERINE KENNEDY
DASHAWN LYNCH
JULIUS ANDERSON
RAYMOND SPRINGS

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members of the criminal enterprise, but not named 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 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, contrary to the provisions of N.J.S.A. 2C:41-2c; or

2. With the purpose of promoting or facilitating the commission of the crime of racketeering, did conspire or agree together and with persons whose identities are known to the Grand

Jurors, that:

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

B. One or more of them would aid in the planning, solicitation or commission of the crime of racketeering, that is, to conduct or participate, directly or indirectly, in the conduct of the enterprises's affairs through a pattern of racketeering activity, in violation of N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES

1. The predicate criminal activity occurred between in or about February 1, 2011 and October 26, 2011.

THE RELEVANT PLACES

2. The predicate criminal activity took place at the City of Atlantic City, in the County of Atlantic; at the Township of Stafford, at the Township of Barnegat, at the Township of Lacey, at the Township of Brick, and at the Township of Toms River in the County of Ocean; at the Township of Hackettstown in the County of Warren; at the Township of Roxbury in the County of Morris; at the Township of Holmdel, and at the Township of Marlboro in the County of Monmouth; at the at the City of Metuchen in the County of Middlesex; at the Township of Clinton in the County of Hunterdon; in the State of New York; in the State of Nevada; elsewhere and within the jurisdiction of this

Court.

THE ENTERPRISE

3. JOHNNY COBB, NURLIN WRIGHT, AVERY JACKSON, OKEE WADE, DEMETRIOUS JORDAN, QUANMIK WELLS, JEFFREY GRIMES, HAVERTON BANKS, ESTERLIN SAMUEL, WAYNE SETTLE, JOSHUA MAZYCK, NATHIFA BEMBREY, ZULIKA HOSTEN, PAUL WINSTON, ORQUIDA WADE, DARRELL RICHARDSON, JAVON WALKER, SHANTE CARPENTER, NICKECHA ROBINSON, CATHERINE KENNEDY, DASHAWN LYNCH, JULIUS ANDERSON and RAYMOND SPRINGS; all of whom are co-conspirators; and other persons whose identities are both known and unknown to the State and are members of the enterprise although not charged 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, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

4. The purposes of the enterprise included the fraudulent takeover of legitimate JP Morgan Chase Bank accounts accomplished as follows: The enterprise had a leadership which financed, organized, supervised and managed the subordinate members in a common course of conduct to gain access to, and obtain account information from, legitimate JP Morgan Chase Bank accounts. Certain individuals-commonly called "bodies"-would open fictitious small business accounts with JP Morgan Chase Bank. Individuals referred to as "add-ons" would pose as the

owner/signer of the legitimate JP Morgan business account whose identifying information had been obtained. The "add-on" and the "body" would then complete the proper paperwork at JP Morgan Chase banks to link the legitimate victim account to the fictitious business account opened by the "body." The leadership would then transfer money from the legitimate account to the fictitious account. The money would either be wired into Atlantic City casinos where the "bodies" would pick it up or the "bodies" would be brought to Atlantic City casinos to withdraw the money from the account through Global Cash Access withdrawals at Atlantic City casinos.

The purposes of the enterprise also included the cashing of counterfeit checks drawn from the accounts of legitimate victims' bank accounts.

THE PATTERN OF RACKETEERING ACTIVITY

5. The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, engaged in by members or associates of the enterprise, did consist of at least two incidents of racketeering conduct during the relevant time period stated above, including but not limited to: Theft by Deception (N.J.S.A. 2C:20-4); Money Laundering (N.J.S.A. 2C:21-25); Attempted Theft by Deception (N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1) and Conspiracy to commit the forgoing crimes (N.J.S.A. 2C:5-2), primarily in the following ways:

NURLIN WRIGHT

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Two, Three, Four, and Seven of this indictment.

JOHNNY COBB

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Two, Three, Four, Five, Seven, Eleven and Twelve of this indictment.

AVERY JACKSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Two, Three, Four, Seven, Nine and Ten of this indictment.

OKEE WADE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Two, Three, Four and Seven of this indictment.

DEMETRIOUS JORDAN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by

Deception and Money Laundering, all of which is the subject of Counts Five, Six, Seven and Eight of this indictment.

QUANMIK WELLS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six and Eight of this indictment.

JEFFREY GRIMES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, Seven and Eight of this indictment.

HAVERTON BANKS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, Seven and Eight of this indictment.

ESTERLIN SAMUEL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all which is the subject of Counts Five, Six, Seven and Eight of this indictment.

WAYNE SETTLE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, Seven and Eight of this indictment.

JOSHUA MAZYCK

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, Seven, Eight and Eleven of this indictment.

NATHIFA BEMBREY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, Seven and Eight of this indictment.

ZULIKA HOSTEN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, and Eight of this indictment.

PAUL WINSTON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of

Counts Five, Six, Seven and Eight of this indictment.

OROUIDA WADE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, Seven and Eight of this indictment.

DARRELL RICHARDSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, and Eight of this indictment.

JAVON WALKER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, Seven and Eight of this indictment.

SHANTE CARPENTER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Five, Six, and Eight of this indictment.

NICKECHA ROBINSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money

Laundrying, all of which is the subject of Counts Five, Six, and Eight of this indictment.

CATHERINE KENNEDY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundrying, all of which is the subject of Counts Five, Six, and Eight of this indictment.

DASHAWN LYNCH

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundrying, all of which is the subject of Counts Five, Six, Seven, and Eight of this indictment.

JULIUS ANDERSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception, Attempted Theft by Deception and Money Laundrying, all of which is the subject of Counts Five, Six, Seven and Eight of this indictment.

RAYMOND SPRINGS

did commit the racketeering conduct by engaging in or conspiring to commit an act of Theft by Deception, which is the subject of Count Twelve of this indictment.

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

COUNT TWO

(Conspiracy - Second Degree)

NURLIN WRIGHT

JOHNNY COBB

AVERY JACKSON

OKEE WADE

between in or about February 1, 2011, and on or about September 3, 2011, at City of Atlantic City, in the County of Atlantic; in the State of New York; in the State of Nevada; elsewhere and within the jurisdiction of this Court, with the purpose of promoting and facilitating the crimes of second degree Theft by Deception and Money Laundering, did agree together that:

1. One or more of them knowingly would engage in conduct which would constitute the aforesaid crime, and

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

A. Theft by Deception, in that one or more of them would purposely obtain the property of another, in the amount of \$75,000 or more, by deception, by creating or reinforcing a false impression, including a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4, and

B. Money Laundering, in that one or more of them would

transport or possess property known or which a reasonable person would believe to be derived from criminal activity with a value of \$75,000 or more or engage in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity with a value of \$75,000 or more, (1) with the intent to facilitate or promote the criminal activity, or (2) knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b.

Contrary to the provisions of N.J.S.A. 2C:5-2 and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Second Degree)

NURLIN WRIGHT

JOHNNY COBB

AVERY JACKSON

OKEE WADE

between on or about February 1, 2011, and September 3, 2011, at the City of Atlantic City, in the County of Atlantic; in the State of New York; in the State of Nevada; elsewhere and within the jurisdiction of this Court, did purposely obtain the property of another, in an amount of \$75,000 or more, by deception, that is, NURLIN WRIGHT, JOHNNY COBB, AVERY JACKSON and OKEE WADE, did create or reinforce the false impression that they were the legitimate and authorized account holders of various JP Morgan Chase bank accounts and were thereby authorized to access, link, transfer and withdraw money from said accounts,

WHEREAS IN TRUTH AND IN FACT, as NURLIN WRIGHT, JOHNNY COBB, AVERY JACKSON, and OKEE WADE well knew, they used the personal identifying information of the authorized JP Morgan Chase bank account holders to unlawfully access, link, transfer and withdraw money from said accounts, in an amount in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2, N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Money Laundering - Second Degree)

NURLIN WRIGHT

JOHNNY COBB

AVERY JACKSON

OKEE WADE

between or about February 1, 2011, and September 3, 2011, at the City of Atlantic City, in the County of Atlantic; in the State of New York; in the State of Nevada; elsewhere and within the jurisdiction of this Court, did commit the offense of money laundering, in that the said NURLIN WRIGHT, JOHNNY COBB, AVERY JACKSON, OKEE WADE, and others whose identities are known and unknown to the Grand Jurors, did transport or possess property with a value of \$75,000 or more, known or which a reasonable person would believe to be derived from criminal activity, that is Theft by Deception, contrary to the provisions of N.J.S.A. 2C:20-4, or did engage in transactions involving property known to be derived from criminal activity, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the criminal activity; that is, NURLIN WRIGHT, JOHNNY COBB, AVERY JACKSON and OKEE WADE and others whose identities are known and unknown to the Grand Jurors, did link

legitimate JP Morgan Chase bank accounts to fictitious JP Morgan Chase accounts, transfer funds from the legitimate accounts to the fictitious accounts, withdraw money from the fictitious accounts through wire transfers and Global Cash Access withdrawals at Atlantic City casinos, and use a portion of those funds to pay the individuals who set up the fictitious accounts or who picked up the wires and made the Global Cash Access withdrawals, contrary to the provisions of N.J.S.A. 2C:21-25a or N.J.S.A. 2C:21-25b(1) or N.J.S.A. 2C:21-25b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Conspiracy - Third Degree)

DEMETRIOUS JORDAN

QUANMIK WELLS

JEFFREY GRIMES

HAVERTON BANKS

ESTERLIN SAMUEL

WAYNE SETTLE

JOSHUA MAZYCK

NATHIFA BEMBREY

ZULIKA HOSTEN

PAUL WINSTON

ORQUIDA WADE

DARRELL RICHARDSON

JAVON WALKER

SHANTE CARPENTER

NICKECHA ROBINSON

CATHERINE KENNEDY

DASHAWN LYNCH

JULIUS ANDERSON

and other persons whose identities are known to the Grand Jurors and are co-conspirators but not named as defendants in this count, between or about February 1, 2011, and September 3, 2011, at the City of Atlantic City, in the County of Atlantic; in the

State of New York; in the State of Nevada; elsewhere and within the jurisdiction of this Court, with the purpose of promoting and facilitating the crimes of third degree Theft by Deception, Attempted Theft by Deception and Money Laundering, did agree that:

1. One or more of them knowingly would engage in conduct which would constitute the aforesaid crime, and

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

A. Theft by Deception, in that one or more of them would purposely obtain the property of another, in the amount of \$500.00 or more, by deception, by creating or reinforcing a false impression, including a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4, and

B. Attempted Theft by Deception, in that one or more of them would purposely attempt to obtain the property of another, in the amount of \$500.00 or more, by deception, by creating or reinforcing a false impression, including a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and

C. Money Laundering, in that one or more of them would transport or possess property known or which a reasonable person would believe to be derived from criminal activity or engage in a

transaction involving property known or which a reasonable person would believe to be derived from criminal activity (1) with the intent to facilitate or promote the criminal activity, or (2) knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b.

The Grand Jurors, aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following overt acts, among others, were committed:

OVERT ACTS

1. On or about February 12, 2011, Darrell Richardson opened up a bank account at JP Morgan Chase Bank in the name of "Richardson's Hair Stylist."

2. On or about March 2, 2011, Paul Winston attempted to pick up a \$13,000 wire transfer from the JP Morgan Chase Bank account of Ottley-Winston.

3. On or about March 15, 2011, Orquida Wade opened up a bank account at JP Morgan Chase Bank in the name of "Orquida's Bakery."

4. On or about March 21, 2011, Catherine Kennedy opened up a bank account at JP Morgan Chase Bank in the name of "Kennedy's Beauty Salon."

5. On or about March 24, 2011, Demetrious Jordan picked up

a \$8,000 wire transfer from the JP Morgan Chase Bank account of "Kennedy's Beauty Salon."

6. On or about March 29, 2011, Javon Walker opened up a bank account at JP Morgan Chase Bank in the name of "Graphics and Design."

7. On or about April 4, 2011, Nickecha Robinson picked up a \$20,000 wire transfer from the JP Morgan Chase Bank account of "Arce's Place."

8. On or about April 5, 2011, Shante Carpenter picked up a \$20,000 wire transfer from the JP Morgan Chase Bank account of "Arce's Place."

9. On or about April 6, 2011, Deshawn Lynch opened up a bank account at JP Morgan Chase Bank in the name of "Lynch Electronics."

10. On or about May 6, 2011, Nathifa Bembrey opened up a bank account at JP Morgan Chase Bank in the name of "Bembrey's Fashion."

11. On or about May 9, 2011, Zulika Hosten opened up a bank account at JP Morgan Chase Bank in the name of "Hosten's Bakery."

12. On or about August 6, 2011, Jeffrey Grimes conducted five Global Cash Access withdrawals from the JP Morgan Chase Bank account of "Nyasias's Graphics and Design."

13. On or about August 6, 2011, Joshua Mazyck conducted five Global Cash Access withdrawals from the JP Morgan Chase Bank

... account of "Nyasia's Graphics and Design."

14. On or about August 6, 2011, Wayne Settle conducted five Global Cash Access withdrawals from the JP Morgan Chase Bank account of "Nyasia's Graphics and Design."

15. On or about August 6, 2011, Quanmik Wells conducted three Global Cash Access withdrawals from the JP Morgan Chase Bank account of "Nyasia's Graphics and Design."

16. On or about August 23, 2011, Esterlin Samuel opened up a bank account at JP Morgan Chase Bank in the name of "ES Roofing and Flooring."

17. On or about September 3, 2011, Julius Anderson conducted two Global Cash Access withdrawals from the JP Morgan Chase Bank account of "ES Roofing and Flooring."

18. On or about September 3, 2011, Haverton Banks conducted five Global Cash Access withdrawals from the JP Morgan Chase Bank account of "Laurel B. Construction."

Contrary to the provisions of N.J.S.A. 2C:5-2 and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft by Deception - Third Degree)

DEMETRIOUS JORDAN

QUANMIK WELLS

JEFFREY GRIMES

HAVERTON BANKS

ESTERLIN SAMUEL

WAYNE SETTLE

JOSHUA MAZYCK

NATHIFA BEMBREY

ZULIKA HOSTEN

PAUL WINSTON

ORQUIDA WADE

DARRELL RICHARDSON

JAVON WALKER

SHANTE CARPENTER

NICKECHA ROBINSON

CATHERINE KENNEDY

DASHAWN LYNCH

JULIUS ANDERSON

and other persons whose identities are known to the Grand Jurors and are co-conspirators but not named as defendants in this count, between on or about February 1, 2011, and September 3, 2011, at City of Atlantic City, in the County of Atlantic,

elsewhere and within the jurisdiction of this Court, did purposely obtain the property of another, in an amount of \$500 or more, by deception, that is, DEMETRIOUS JORDAN, QUANMIK WELLS, JEFFREY GRIMES, HAVERTON BANKS, ESTERLIN SAMUEL, WAYNE SETTLE, JOSHUA MAZYCK, NATHIFA BEMBREY, ZULIKA HOSTEN, PAUL WINSTON, ORQUIDA WADE, DARRELL RICHARDSON, JAVON WALKER, SHANTE CARPENTER, NICKECHA ROBINSON, CATHERINE KENNEDY, DASHAWN LYNCH, JULIUS ANDERSON, and other persons whose identities are known to the Grand Jurors and are co-conspirators but not named as defendants in this count, did create or reinforce the false impression that they were the legitimate and authorized account holders of various JP Morgan Chase bank accounts and were thereby authorized to access, link, transfer and withdraw money from said accounts,

WHEREAS IN TRUTH AND IN FACT, as DEMETRIOUS JORDAN, QUANMIK WELLS, JEFFREY GRIMES, HAVERTON BANKS, ESTERLIN SAMUEL, WAYNE SETTLE, JOSHUA MAZYCK, NATHIFA BEMBREY, ZULIKA HOSTEN, PAUL WINSTON, ORQUIDA WADE, DARRELL RICHARDSON, JAVON WALKER, SHANTE CARPENTER, NICKECHA ROBINSON, CATHERINE KENNEDY, DASHAWN LYNCH, JULIUS ANDERSON, and other persons whose identities are known to the Grand Jurors and are co-conspirators but not named as defendants in this count well knew, they used the personal identifying information of the authorized JP Morgan Chase bank account holders to unlawfully access, link, transfer and withdraw money from said accounts, in an amount in excess of \$500,

contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2,
N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT SEVEN

(Attempted Theft by Deception - Third Degree)

DEMETRIOUS JORDAN

JEFFREY GRIMES

HAVERTON BANKS

ESTERLIN SAMUEL

WAYNE SETTLE

JOSHUA MAZYCK

NATHIFA BEMBREY

PAUL WINSTON

ORQUIDA WADE

JAVON WALKER

DASHAWN LYNCH

JULIUS ANDERSON

and other persons whose identities are known to the Grand Jurors and are co-conspirators but not named as defendants in this count, between on or about February 1, 2011, and September 3, 2011, at City of Atlantic City, in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did attempt to purposely obtain the property of another, in an amount of \$500 or more, by deception, that is, DEMETRIOUS JORDAN, JEFFREY GRIMES, HAVERTON BANKS, ESTERLIN SAMUEL, WAYNE SETTLE, JOSHUA MAZYCK, NATHIFA BEMBREY, PAUL WINSTON, ORQUIDA WADE, JAVON WALKER, DASHAWN LYNCH, JULIUS ANDERSON, and other persons whose

identities are known to the Grand Jurors and are co-conspirators but not named as defendants in this count, did create or reinforce the false impression that they were the legitimate and authorized account holders of various JP Morgan Chase bank accounts and were thereby authorized to access, link, transfer and withdraw money from said accounts,

WHEREAS IN TRUTH AND IN FACT, as DEMETRIOUS JORDAN, JEFFREY GRIMES, HAVERTON BANKS, ESTERLIN SAMUEL, WAYNE SETTLE, JOSHUA MAZYCK, NATHIFA BEMBREY, PAUL WINSTON, ORQUIDA WADE, JAVON WALKER, DASHAWN LYNCH, JULIUS ANDERSON, and other persons whose identities are known to the Grand Jurors and are co-conspirators but not named as defendants in this count well knew, they used the personal identifying information of the authorized JP Morgan Chase bank account holders to unlawfully access, link, transfer and attempt to withdraw money from said accounts, in an amount in excess of \$500, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2, N.J.S.A. 2C:2-6, N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Money Laundering - Third Degree)

DEMETRIOUS JORDAN

QUANMIK WELLS

JEFFREY GRIMES

HAVERTON BANKS

ESTERLIN SAMUEL

WAYNE SETTLE

JOSHUA MAZYCK

NATHIFA BEMBREY

ZULIKA HOSTEN

PAUL WINSTON

ORQUIDA WADE

DARRELL RICHARDSON

JAVON WALKER

SHANTE CARPENTER

NICKECHA ROBINSON

CATHERINE KENNEDY

DASHAWN LYNCH

JULIUS ANDERSON

and other persons whose identities are known to the Grand Jurors and are co-conspirators but not named as defendants in this count, between on or about February 1, 2011, and September 3, 2011, at City of Atlantic City, in the County of Atlantic; in the

State of New York; in the State of Nevada; elsewhere and within the jurisdiction of this Court, did commit the offense of money laundering, in that the said DEMETRIOUS JORDAN, QUANMIK WELLS, JEFFREY GRIMES, HAVERTON BANKS, ESTERLIN SAMUEL, WAYNE SETTLE, JOSHUA MAZYCK, NATHIFA BEMBREY, ZULIKA HOSTEN, PAUL WINSTON, ORQUIDA WADE, DARRELL RICHARDSON, JAVON WALKER, SHANTE CARPENTER, NICKECHA ROBINSON, CATHERINE KENNEDY, DASHAWN LYNCH, JULIUS ANDERSON, and other persons whose identities are known to the Grand Jurors and are co-conspirators but not named as defendants in this count, did transport or possess property known or which a reasonable person would believe to be derived from criminal activity, that is Theft by Deception, contrary to the provisions of N.J.S.A. 2C:20-4, or did engage in transactions involving property known to be derived from criminal activity, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the criminal activity; that is DEMETRIOUS JORDAN, QUANMIK WELLS, JEFFREY GRIMES, HAVERTON BANKS, ESTERLIN SAMUEL, WAYNE SETTLE, JOSHUA MAZYCK, NATHIFA BEMBREY, ZULIKA HOSTEN, PAUL WINSTON, ORQUIDA WADE, DARRELL RICHARDSON, JAVON WALKER, SHANTE CARPENTER, NICKECHA ROBINSON, CATHERINE KENNEDY, DASHAWN LYNCH, JULIUS ANDERSON, and other persons whose identities are known to the Grand Jurors and are

co-conspirators but not named as defendants in this count, did link legitimate JP Morgan Chase bank accounts to fictitious JP Morgan Chase accounts, transfer funds from the legitimate accounts to the fictitious accounts, then withdraw money from the fictitious accounts through wire transfers and Global Cash Access withdrawals at Atlantic City casinos, and use a portion of those funds to pay the individuals who set up the fictitious accounts or picked up the wires and made the Global Cash Access withdrawals, contrary to the provisions of N.J.S.A. 2C:21-25a or N.J.S.A. 2C:21-25b(1) or N.J.S.A. 2C:21-25b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Theft by Deception - Third Degree)

AVERY JACKSON

between on or about August 1, 2011, and September 29, 2011, at the Township of Stafford, at the Township of Barnegat, and at the Township of Lacey, in the County of Ocean; at the Township of Hackettstown, and at the Township of Mansfield, in the County of Warren; elsewhere and within the jurisdiction of this Court, did purposely obtain the property of another, in an amount in excess of \$500, by creating or reinforcing the false impression that checks AVERY JACKSON cashed at Wells Fargo Bank were legitimate, whereas in truth and in fact, as AVERY JACKSON well knew, the checks were counterfeit, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Attempted Theft by Deception - Third Degree)

AVERY JACKSON

between on or about September 21, 2011 and September 29, 2011, at the Township of Roxbury, in the County of Morris; at the Township of Brick, and at the Township of Toms River, in the County of Ocean; at the Township of Holmdel, and at the Township of Marlboro, in the County of Monmouth; elsewhere and within the jurisdiction of this Court, did purposely attempt to obtain the property of another, in an amount in excess of \$500, by creating or reinforcing the false impression that checks AVERY JACKSON attempted to cash at Wells Fargo Bank and TD Bank were legitimate, whereas in truth and in fact, as AVERY JACKSON well knew, the checks were counterfeit, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2, N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Attempted Theft by Deception - Third Degree)

JOHNNY COBB

and

JOSHUA MAZYCK

on or about October 10, 2011, at the City of Metuchen, in the County of Middlesex, elsewhere and within the jurisdiction of this Court, did purposely attempt to obtain the property of another, in an amount in excess of \$500, by creating or reinforcing the false impression that checks JOSHUA MAZYCK attempted to cash at TD Bank were legitimate, whereas in truth and in fact, as JOSHUA MAZYCK and JOHNNY COBB well knew, the checks were counterfeit, contrary to the provisions of N.J.S.A. 2C:20-4, 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 TWELVE

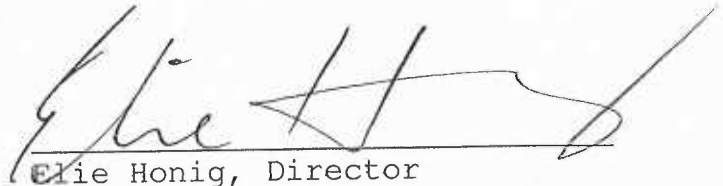
(Attempted Theft by Deception - Third Degree)

JOHNNY COBB

and

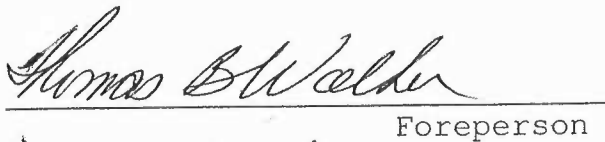
RAYMOND SPRINGS

on or about October 26, 2011, at the Township of Clinton, in the County of Hunterdon, elsewhere and within the jurisdiction of this Court, did purposely attempt to obtain the property of another, in an amount in excess of \$500, by creating or reinforcing the false impression that checks RAYMOND SPRINGS attempted to cash at TD Bank were legitimate, whereas in truth and in fact, as RAYMOND SPRINGS and JOHNNY COBB well knew, the checks were counterfeit, contrary to the provisions of N.J.S.A. 2C:20-4, 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.



Elie Honig, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 6/27/2013

FILED

JUN 27 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ639-13-6

Superior Court

Docket Number

13 - 06 - 00123 - S

STATE OF NEW JERSEY

v.

JOHNNY COBB

NURLIN WRIGHT

AVERY JACKSON

OKEE WADE

DEMETRIOUS JORDAN

QUANMIK WELLS

JEFFREY GRIMES

HAVERTON BANKS

ESTERLIN SAMUEL

WAYNE SETTLE

JOSHUA MAZYCK

NATHIFA BEMBREY

ZULAIKA HOSTEN

PAUL WINSTON

ORQUIDA WADE

DARREL RICHARDSON

JAVON WALKER

SHANTE CARPENTER

NICKECHA ROBINSON

CATHERINE KENNEDY


ORDER OF VENUE

DASHAWN LYNCH)
JULIUS ANDERSON)
 and)
RAYMOND SPRINGS)

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

IT IS ORDERED on this 27th day of June, 2013, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Atlantic 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 Atlantic for filing.


Pedro J. Jimenez, Jr., J.S.C.