

FILED

DEC 18 2014

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Docket Number SGJ659-14-8

Superior Court

Docket Number

14-12-00194-S

STATE OF NEW JERSEY)

v.)

LEON NII-MOI)

KYLE CHAMPAGNIE)

INDICTMENT

OMAR SMITH)

YVES AUGUSTIN)

SALADINE GRANT)

JAMES HEMPHILL)

DEMARCO SPARKS)

KOJO MARFO)

NATHANIEL BARNES)

ABDUR ABDULLAH)

KEVIN BURTON)

ROBERT ALEXANDER)

CRAIG BOONE)

TERRELL SAVAGE)

IBN TRAYNHAM)

MALIK BAKER)

JIM BRYANT, JR.)

JOHNNIE DAVILA)

KURTIS BOSSIE)

AHMAD NASIDI)
ABDUL DAILEY III)
DANIEL HUNT)
STEVE MCGRAW)
KYLE BOTTS)
WOODY ARMAND)
FATE LUCAS)

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

COUNT ONE

(Racketeering - First Degree)

LEON NII-MOI

KYLE CHAMPAGNIE

OMAR SMITH

YVES AUGUSTIN

JIM BRYANT, JR.

KURTIS BOSSIE

SALADINE GRANT

JAMES HEMPHILL

AHMAD NASIDI

NATHANIEL BARNES

TERRELL SAVAGE

ABDUL DAILEY III

KOJO MARFO

MALIK BAKER

JOHNNIE DAVILA

KEVIN BURTON

ROBERT ALEXANDER

CRAIG BOONE

IBN TRAYNHAM

DEMARCO SPARKS

ABDUR ABDULLAH

DANIEL HUNT

STEVE MCGRAW

KYLE BOTTS

WOODY ARMAND

and

FATE LUCAS

and other persons whose identities are known and unknown to the Grand Jurors, at the times and places hereinafter 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 within the State of New Jersey, in that they 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 and N.J.S.A. 2C:41-2d, all as herein described.

The Relevant Times and Places

The predicate criminal activity and conspiracy occurred between on or about April 1, 2013 and February 27, 2014, at the Borough of Hasbrouck Heights and the Borough of Little Ferry, both in the County of Bergen, in the Township of Mansfield, in the County of Burlington, at the City of East Orange, at the Township of Irvington, at the City of Newark, at the Township of Verona and at the Township of West Caldwell, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus and at the City of Union City, all in the County of Hudson, at the Township of Robbinsville, in the County of Mercer, at the City of Edison, in the County of Middlesex, at the Township of Colts Neck and at the Township of Manalapan, both in the County of Monmouth, at the Borough of Kinnelon, in the County of Morris, at the City of Clifton, in the County of Passaic, at the Township of Warren and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, at the City of Linden, at the Borough of Roselle, and at the City of Rahway, at the Township of Hillside, all in the County of Union, at the Borough of Watchung, in the County of Warren; in the State of New York; in the State of Connecticut; in the State of Massachusetts; in the Country of Ghana; elsewhere, and within the jurisdiction of this Court.

The Enterprise

LEON NII-MOI, KYLE CHAMPAGNIE, OMAR SMITH, YVES AUGUSTIN,

JIM BRYANT, JR., KURTIS BOSSIE, SALADINE GRANT, JAMES HEMPHILL, AHMAD NASIDI, NATHANIEL BARNES, TERRELL SAVAGE, ABDUL DAILEY III, KOJO MARFO, MALIK BAKER, JOHNNIE DAVILA, KEVIN BURTON, ROBERT ALEXANDER, CRAIG BOONE, IBN TRAYNHAM, DEMARCO SPARKS, ABDUR ABDULLAH, DANIEL HUNT, STEVE MCGRAW, KYLE BOTTS, WOODY ARMAND, FATE LUCAS, and other persons whose identities are known and unknown to the Grand Jurors, and are members or associates of this 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 for the purposes set forth below.

The Purposes of the Enterprise

The purposes of the enterprise included obtaining money for members and associates of the enterprise through violations of the laws of the State of New Jersey, including, but not limited to, Financial Facilitation of Criminal Activity (Money Laundering), Leader of an Auto Theft Trafficking Network, Carjacking, Robbery, Burglary, Aggravated Assault, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, Theft by Deception, Forgery and Related Offenses, and Altering a Motor Vehicle Identification Number.

The Pattern of Racketeering Activity

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, consisted of at least two incidents of racketeering conduct by members of the enterprise, including but not limited

to: Financial Facilitation of Criminal Activity (Money Laundering) (N.J.S.A. 2C:21-25), Leader of an Auto Theft Trafficking Network (N.J.S.A. 2C:20-18), Carjacking (N.J.S.A. 2C:15-2), Robbery (N.J.S.A. 2C:15-1), Burglary (N.J.S.A. 2C:18-2), Aggravated Assault (N.J.S.A. 2C:12-1b(4)), Fencing-Dealing in Stolen Property (N.J.S.A. 2C:20-7.1), Receiving Stolen Property (N.J.S.A. 2C:20-7), Theft by Unlawful Taking (N.J.S.A. 2C:20-3), Theft by Deception (N.J.S.A. 2C:20-4), Forgery and Related Offenses (N.J.S.A. 2C:21-1), Altering a Motor Vehicle Identification Number (N.J.S.A. 2C:17-6(a)), and Conspiracy to commit the foregoing crimes (N.J.S.A. 2C:5-2) as described herein.

Leon Nii-Moi

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Leader of an Auto Theft Trafficking Network, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Four, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Kyle Champaigne

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Leader of an Auto Theft Trafficking Network, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking,

and Burglary, all of which is the subject of Counts Two, Three, Four, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Omar Smith

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Leader of an Auto Theft Trafficking Network, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Four, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Yves Augustin

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Carjacking, Robbery, Burglary, Aggravated Assault, Fencing-Dealing in Stolen Property, Receiving Stolen Property, and Theft by Unlawful Taking, all of which is the subject of Counts Two, Three, Five, Six, Seven, Eight, Nine, Ten, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Jim Bryant, Jr.

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Carjacking, Robbery, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Twelve, Thirteen, Fourteen,

Fifteen, Sixteen, and Seventeen of this Indictment.

Kurtis Bossie

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Carjacking, Robbery, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Twelve, Thirteen, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Saladine Grant

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

James Hemphill

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Ahmad Nasidi

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-

Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Nathaniel Barnes

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Terrell Savage

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Abdul Dailey

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Kojo Marfo

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Malik Baker

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Johnnie Davila

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Sixteen, and Seventeen of this Indictment.

Kevin Burton

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by

Unlawful Taking, Burglary, Theft by Deception, and Uttering a Forged Document, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Seventeen, Eighteen, and Nineteen of this Indictment.

Robert Alexander

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, Burglary, Theft by Deception, and Uttering a Forged Document, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Seventeen, Eighteen, and Nineteen of this Indictment.

Craig Boone

did commit the racketeering conduct of Conspiracy, Financial Facilitation of Criminal Activity (Money Laundering), Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, Burglary, Theft by Deception, and Uttering a Forged Document, all of which is the subject of Counts Two, Three, Fourteen, Fifteen, Seventeen, Eighteen, and Nineteen of this Indictment.

Ibn Traynham

did commit the racketeering conduct of Conspiracy, Receiving Stolen Property, and Altering a Motor Vehicle Identification Number, all of which is the subject of Counts Two, Fifteen, Twenty-One, and Twenty-Two of this Indictment.

Demarco Sparks

did commit the racketeering conduct of Conspiracy, which is the subject of Count Two of this Indictment.

Abdur Abdullah

did commit the racketeering conduct of Conspiracy, which is the subject of Count Two of this Indictment.

Daniel Hunt

did commit the racketeering conduct of Conspiracy, which is the subject of Count Two of this Indictment.

Steve McGraw

did commit the racketeering conduct of Conspiracy, which is the subject of Count Two of this Indictment.

Kyle Botts

did commit the racketeering conduct of Conspiracy, which is the subject of Count Two of this Indictment.

Woody Armand

did commit the racketeering conduct of Conspiracy, which is the subject of Count Two of this Indictment.

Fate Lucas

did commit the racketeering conduct of Conspiracy, which is the subject of Count Two 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 - First Degree)

LEON NII-MOI

KYLE CHAMPAGNIE

OMAR SMITH

YVES AUGUSTIN

JIM BRYANT, JR.

KURTIS BOSSIE

SALADINE GRANT

JAMES HEMPHILL

AHMAD NASIDI

NATHANIEL BARNES

TERRELL SAVAGE

ABDUL DAILEY III

KOJO MARFO

MALIK BAKER

JOHNNIE DAVILA

KEVIN BURTON

ROBERT ALEXANDER

CRAIG BOONE

IBN TRAYNHAM

DEMARCO SPARKS

ABDUR ABDULLAH

DANIEL HUNT

STEVE MCGRAW

KYLE BOTTS

WOODY ARMAND

and

FATE LUCAS

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 April 1, 2013, and February 27, 2014, at the Borough of Hasbrouck Heights and the Borough of Little Ferry, both in the County of Bergen, in the Township of Mansfield, in the County of Burlington, at the City of East Orange, at the Township of Irvington, at the City of Newark, at the Township of Verona and at the Township of West Caldwell, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus and at the City of Union City, all in the County of Hudson, at the Township of Robbinsville, in the County of Mercer, at the City of Edison, in the County of Middlesex, at the Township of Colts Neck and at the Township of Manalapan, both in the County of Monmouth, at the Borough of Kinnelon, in the County of Morris, at the City of Clifton, in the County of Passaic, at the Township of Warren and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, at the City of Linden, at the Borough of Roselle, and at the City of Rahway, at the Township of Hillside, all in the County of Union, at the Borough of Watchung, in the County of Warren; in the State of New York; in the State of Connecticut; in the State of Massachusetts; in the Country of Ghana; elsewhere,

and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Financial Facilitation of Criminal Activity (Money Laundering), Carjacking, Robbery, Burglary, Aggravated Assault, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, Theft by Deception, Forgery and Related Offenses, and Altering a Motor Vehicle Identification Number, did agree together and with persons known to the Grand Jurors who were acting at the direction of law enforcement 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 transport or possess property known, or which a reasonable person would believe to be, derived from criminal activity, with a value in excess of \$500,000.00, or to engage in transactions involving such property with the intent to facilitate the criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b(1); and

2. Knowingly or purposely to inflict injury or use force upon an occupant or person in possession or control of a motor vehicle, or to threaten an occupant or person in control of a motor vehicle, or put them in fear of, immediate bodily injury, while in the course of committing an unlawful taking of a motor vehicle, or in an attempt to commit an unlawful taking of a motor

vehicle, contrary to the provisions of N.J.S.A. 2C:15-2a(1); and

3. Knowingly or purposely to use force upon another, or to threaten another with, or put another in fear of, immediate bodily injury while in the course of committing a theft, contrary to the provisions of N.J.S.A. 2C:15-1(a) and (b); and

4. Knowingly or purposely to enter a motor vehicle with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2a(1); and

5. Knowingly or purposely to point a firearm at another under circumstances manifesting extreme indifference to the value of human life, contrary to the provisions N.J.S.A. 2C:12-1b(4);

6. Knowingly or purposely to traffic in, or initiate organize, plan, finance, direct, manage, or supervise the trafficking in stolen property having a value in excess of \$75,000.00, contrary to the provisions of N.J.S.A. 2C:20-7.1(b); and

7. Knowingly or purposely to commit theft by receiving or bringing into this State moveable property of others having a value in excess of \$75,000.00, knowing the same to be stolen or believing that it had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7(a);

8. Knowingly or purposely to unlawfully exercise control over moveable property of another, having a value in excess of \$75,000.00 with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3a; and

9. Knowingly or purposely to obtain the property of

another, by deception, having an aggregate value in excess of \$75,000.00, contrary to N.J.S.A. 2C:20-4; and

10. Knowingly or purposely to utter a document knowing it to be forged in a manner specified in N.J.S.A. 2C:21-1a(2), with purpose to defraud, or with knowledge that they were facilitating a fraud to be perpetrated by anyone, contrary to the provisions of N.J.S.A. 2C:21-1a(3); and

11. Knowingly or purposely to remove, alter, or change the motor vehicle identification number on a motor vehicle for an unlawful purpose, contrary to the provisions of N.J.S.A. 2C:17-6(a); and

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Financial Facilitation of Criminal Activity - First Degree)

LEON NII-MOI

KYLE CHAMPAGNIE

OMAR SMITH

YVES AUGUSTIN

JIM BRYANT, JR.

KURTIS BOSSIE

SALADINE GRANT

JAMES HEMPHILL

AHMAD NASIDI

NATHANIEL BARNES

TERRELL SAVAGE

ABDUL DAILEY III

KOJO MARFO

MALIK BAKER

JOHNNIE DAVILA

KEVIN BURTON

ROBERT ALEXANDER

and

CRAIG BOONE

and other persons whose identities are known and unknown to the Grand Jurors, between on or about April 1, 2013 and February 27, 2014, at the Borough of Hasbrouck Heights and the Borough of Little Ferry, both in the County of Bergen, in the Township of Mansfield, in the County of Burlington, at the City of East

Orange, at the Township of Irvington, at the City of Newark, at the Township of Verona and at the Township of West Caldwell, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus and at the City of Union City, all in the County of Hudson, at the Township of Robbinsville, in the County of Mercer, at the City of Edison, in the County of Middlesex, at the Township of Colts Neck and at the Township of Manalapan, both in the County of Monmouth, at the Borough of Kinnelon, in the County of Morris, at the City of Clifton, in the County of Passaic, at the Township of Warren and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, at the City of Linden, at the Borough of Roselle, and at the City of Rahway, at the Township of Hillside, all in the County of Union, at the Borough of Watchung, in the County of Warren; in the State of New York; in the State of Connecticut; in the State of Massachusetts; in the Country of Ghana; elsewhere, and within the jurisdiction of this Court, did commit the offense of financial facilitation of criminal activity, in that, the said LEON NII-MOI, KYLE CHAMPAGNIE, OMAR SMITH, YVES AUGUSTIN, JIM BRYANT, JR., KURTIS BOSSIE, SALADINE GRANT, JAMES HEMPHILL, AHMAD NASIDI, NATHANIEL BARNES, TERRELL SAVAGE, ABDUL DAILEY III, KOJO MARFO, MALIK BAKER, JOHNNIE DAVILA, KEVIN BURTON, ROBERT ALEXANDER, CRAIG BOONE, and other persons whose identities are known and unknown to the Grand Jurors, did transport or possess property known, or which a reasonable person would believe to be, derived from criminal activity, with a value in excess of

\$500,000.00, or did engage in transactions involving such property with the intent to facilitate the criminal activity, all contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Leader of an Auto Theft Trafficking Network- Second Degree)

KYLE CHAMPAGNIE

LEON NII-MOI

and

OMAR SMITH

between on or about April 1, 2013 and February 27, 2014, at the Borough of Hasbrouck Heights and the Borough of Little Ferry, both in the County of Bergen, in the Township of Mansfield, in the County of Burlington, at the City of East Orange, at the Township of Irvington, at the City of Newark, at the Township of Verona and at the Township of West Caldwell, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus and at the City of Union City, all in the County of Hudson, at the Township of Robbinsville, in the County of Mercer, at the City of Edison, in the County of Middlesex, at the Township of Colts Neck and at the Township of Manalapan, both in the County of Monmouth, at the Borough of Kinnelon, in the County of Morris, at the City of Clifton, in the County of Passaic, at the Township of Warren and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, at the City of Linden, at the Borough of Roselle, and at the City of Rahway, at the Township of Hillside, all in the County of Union, at the Borough of Watchung, in the County of Warren; in the State of New York; in the State of Connecticut; in the State of Massachusetts; in the Country of Ghana; elsewhere, and within the jurisdiction of

this Court, knowingly did conspire with others as organizers, supervisors, financiers or managers, to engage for profit in a scheme or course of conduct to unlawfully take, dispose of, distribute, bring into or transport in this State automobiles as stolen property, contrary to the provisions of N.J.S.A. 2C:20-18, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Carjacking - First Degree)

YVES AUGUSTIN

on or about July 3, 2013, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, while in the course of committing an unlawful taking of a motor vehicle, or in an attempt to commit an unlawful taking of a motor vehicle, knowingly did use force upon A.R., or did threaten A.R. with, or purposely or knowingly did put A.R. in fear of, immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-2a(1), N.J.S.A. 2C:15-2a(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX.

(Robbery - First Degree)

YVES AUGUSTIN

on or about July 3, 2013, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did use force upon A.R., or threaten A.R. with, or purposely put A.R. in fear of, immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-1(a)(1), N.J.S.A. 2C:15-1(a)(2), N.J.S.A. 2C:15-1(b), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Burglary - Second Degree)

YVES AUGUSTIN

on or about July 3, 2013, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly enter a motor vehicle with the purpose to commit an offense therein while armed with or displaying what appeared to be a deadly weapon, contrary to the provisions of N.J.S.A. 2C:18-2a(1), N.J.S.A. 2C:18-2b(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Aggravated Assault - Fourth Degree)

YVES AUGUSTIN

on or about July 3, 2013, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did point a firearm in the direction of A.R. under circumstances manifesting extreme indifference to the value of human life, contrary to the provisions of N.J.S.A. 2C:12-1b(4), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Carjacking-First Degree)

YVES AUGUSTIN

on or about July 9, 2013, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, while in the course of committing an unlawful taking of a motor vehicle, or in an attempt to commit an unlawful taking of a motor vehicle, knowingly did use force upon C.M., or did threaten C.M. with, or purposely or knowingly did put C.M. in fear of, immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-2a(1), N.J.S.A. 2C:15-2a(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same

COUNT TEN

(Robbery - Second Degree)

YVES AUGUSTIN

on or about July 9, 2013, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did use force upon C.M., or threaten C.M. with, or purposely put C.M. in fear of, immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-1(a)(1), N.J.S.A. 2C:15-1(a)(2), N.J.S.A. 2C:15-1(b), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Eluding - Second Degree)

YVES AUGUSTIN

on or about July 9, 2013, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, while operating a motor vehicle on a street or highway in this State, knowingly did flee or attempt to elude a police or law enforcement officer after having received a signal from such officer to bring that motor vehicle to a stop, that is, the said YVES AUGUSTIN, did operate a motor vehicle on or near 18th Avenue in Newark, and having received a signal to bring that motor vehicle to a stop by Officer David Fortenberry of the Newark Police Department, did flee and attempt to elude Officer David Fortenberry and in doing so the said YVES AUGUSTIN did operate the said motor vehicle in such a fashion as to create a risk of death or injury to another, contrary to the provisions of N.J.S.A. 2C:29-2b, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Carjacking- First Degree)

JIM BRYANT, JR.

and

KURTIS BOSSIE

on or about January 29, 2014, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, while in the course of committing an unlawful taking of a motor vehicle, or in an attempt to commit an unlawful taking of a motor vehicle, knowingly did use force upon V.P., or did threaten V.P. with, or purposely or knowingly did put V.P. in fear of, immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-2a(1), N.J.S.A. 2C:15-2a(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same

COUNT THIRTEEN

(Robbery - Second Degree)

JIM BRYANT, JR.

and

KURTIS BOSSIE

on or about January 29, 2014, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did use force upon V.P., or threaten V.P. with, or purposely put V.P. in fear of, immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-1(a)(1), N.J.S.A. 2C:15-1(a)(2), N.J.S.A. 2C:15-1(b), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Fencing-Dealing in Stolen Property - Second Degree)

LEON NII-MOI

KYLE CHAMPAGNIE

OMAR SMITH

YVES AUGUSTIN

JIM BRYANT, JR.

KURTIS BOSSIE

SALADINE GRANT

JAMES HEMPHILL

AHMAD NASIDI

NATHANIEL BARNES

TERRELL SAVAGE

ABDUL DAILEY III

KOJO MARFO

MALIK BAKER

JOHNNIE DAVILA

KEVIN BURTON

ROBERT ALEXANDER

and

CRAIG BOONE

and other persons whose identities are known and unknown to the Grand Jurors, between on or about April 1, 2013 and February 27, 2014, at the Borough of Hasbrouck Heights and the Borough of Little Ferry, both in the County of Bergen, in the Township of

Mansfield, in the County of Burlington, at the City of East Orange, at the Township of Irvington, at the City of Newark, at the Township of Verona and at the Township of West Caldwell, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus and at the City of Union City, all in the County of Hudson, at the Township of Robbinsville, in the County of Mercer, at the City of Edison, in the County of Middlesex, at the Township of Colts Neck and at the Township of Manalapan, both in the County of Monmouth, at the Borough of Kinnelon, in the County of Morris, at the City of Clifton, in the County of Passaic, at the Township of Warren and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, at the City of Linden, at the Borough of Roselle, and at the City of Rahway, at the Township of Hillside, all in the County of Union, at the Borough of Watchung, in the County of Warren; in the State of New York; in the State of Connecticut; in the State of Massachusetts; in the Country of Ghana; elsewhere, and within the jurisdiction of this Court did traffic in, or initiate, organize, plan, finance, direct, manage, or supervise the trafficking in stolen motor vehicles having a value in excess of \$75,000.00, contrary to the provisions of N.J.S.A. 2C:20-7.1b, 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 FIFTEEN

(Receiving Stolen Property - Second Degree)

LEON NII-MOI

KYLE CHAMPAGNIE

OMAR SMITH

YVES AUGUSTIN

JIM BRYANT, JR.

KURTIS BOSSIE

SALADINE GRANT

JAMES HEMPHILL

AHMAD NASIDI

NATHANIEL BARNES

TERRELL SAVAGE

ABDUL DAILEY III

KOJO MARFO

MALIK BAKER

JOHNNIE DAVILA

KEVIN BURTON

ROBERT ALEXANDER

IBN TRAYNHAM

and

CRAIG BOONE

and other persons whose identities are known and unknown to the Grand Jurors, between on or about April 1, 2013 and February 27, 2014, at the Borough of Hasbrouck Heights and the Borough of

Little Ferry, both in the County of Bergen, in the Township of Mansfield, in the County of Burlington, at the City of East Orange, at the Township of Irvington, at the City of Newark, at the Township of Verona and at the Township of West Caldwell, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus and at the City of Union City, all in the County of Hudson, at the Township of Robbinsville, in the County of Mercer, at the City of Edison, in the County of Middlesex, at the Township of Colts Neck and at the Township of Manalapan, both in the County of Monmouth, at the Borough of Kinnelon, in the County of Morris, at the City of Clifton, in the County of Passaic, at the Township of Warren and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, at the City of Linden, at the Borough of Roselle, and at the City of Rahway, at the Township of Hillside, all in the County of Union, at the Borough of Watchung, in the County of Warren; in the State of New York; in the State of Connecticut; in the State of Massachusetts; in the Country of Ghana; elsewhere, and within the jurisdiction of this Court did commit theft by knowingly receiving or bringing into this State moveable property of others, that is, motor vehicles, having a value in excess of \$75,000.00, knowing the same to be stolen or believing that they had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7, 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 SIXTEEN

(Theft by Unlawful Taking - Second Degree)

LEON NII-MOI

KYLE CHAMPAGNIE

OMAR SMITH

YVES AUGUSTIN

JIM BRYANT, JR.

KURTIS BOSSIE

SALADINE GRANT

JAMES HEMPHILL

AHMAD NASIDI

NATHANIEL BARNES

TERRELL SAVAGE

ABDUL DAILEY III

KOJO MARFO

MALIK BAKER

and

JOHNNIE DAVILA

and other persons whose identities are known and unknown to the Grand Jurors, between on or about April 1, 2013 and February 27, 2014, at the Borough of Hasbrouck Heights and the Borough of Little Ferry; both in the County of Bergen, in the Township of Mansfield, in the County of Burlington, at the City of East Orange, at the Township of Irvington, at the City of Newark, at the Township of Verona and at the Township of West Caldwell, all

in the County of Essex, at the City of Jersey City, at the Township of Secaucus and at the City of Union City, all in the County of Hudson, at the Township of Robbinsville, in the County of Mercer, at the City of Edison, in the County of Middlesex, at the Township of Colts Neck and at the Township of Manalapan, both in the County of Monmouth, at the Borough of Kinnelon, in the County of Morris, at the City of Clifton, in the County of Passaic, at the Township of Warren and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, at the City of Linden, at the Borough of Roselle, and at the City of Rahway, at the Township of Hillside, all in the County of Union, at the Borough of Watchung, in the County of Warren; in the State of New York; in the State of Connecticut; in the State of Massachusetts; in the Country of Ghana; elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise control over moveable property of others, that is motor vehicles, having a value in excess of \$75,000.00, with purpose to deprive the owners thereof, contrary to the provisions of N.J.S.A. 2C:20-3a, 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 SEVENTEEN

(Burglary - Third Degree)

LEON NII-MOI

KYLE CHAMPAGNIE

OMAR SMITH

YVES AUGUSTIN

JIM BRYANT, JR.

KURTIS BOSSIE

SALADINE GRANT

JAMES HEMPHILL

AHMAD NASIDI

NATHANIEL BARNES

TERRELL SAVAGE

ABDUL DAILEY III

KOJO MARFO

MALIK BAKER

JOHNNIE DAVILA

KEVIN BURTON

ROBERT ALEXANDER

and

CRAIG BOONE

and other persons whose identities are known and unknown to the Grand Jurors between on or about April 1, 2013 and February 27, 2014, at the Borough of Hasbrouck Heights and the Borough of Little Ferry, both in the County of Bergen, in the Township of

Mansfield, in the County of Burlington, at the City of East Orange, at the Township of Irvington, at the City of Newark, at the Township of Verona and at the Township of West Caldwell, all in the County of Essex, at the City of Jersey City, at the Township of Secaucus and at the City of Union City, all in the County of Hudson, at the Township of Robbinsville, in the County of Mercer, at the City of Edison, in the County of Middlesex, at the Township of Colts Neck and at the Township of Manalapan, both in the County of Monmouth, at the Borough of Kinnelon, in the County of Morris, at the City of Clifton, in the County of Passaic, at the Township of Warren and at the Township of Bridgewater, both in the County of Somerset, at the City of Elizabeth, at the City of Linden, at the Borough of Roselle, and at the City of Rahway, at the Township of Hillside, all in the County of Union, at the Borough of Watchung, in the County of Warren; in the State of New York; in the State of Connecticut; in the State of Massachusetts; in the Country of Ghana; elsewhere, and within the jurisdiction of this Court knowingly did enter a motor vehicle or motor vehicles with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Theft by Deception - Second Degree)

KEVIN BURTON

ROBERT ALEXANDER

CRAIG BOONE

between on or about August 29, 2013 and on or about October 11, 2013, at the Borough of Hasbrouck Heights, in the County of Bergen, at the Township of West Caldwell, in the County of Essex, at the City of Edison, in the County of Middlesex, at the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another having an aggregate value of \$75,000.00 or more, by deception, that is, KEVIN BURTON, ROBERT ALEXANDER, and CRAIG BOONE purposely did obtain motor vehicles by presenting fraudulent bank checks and fictitious drivers licenses to used and new car dealerships, thereby creating or reinforcing a false impression to the dealerships as to their identities and the validity of the bank checks;

WHEREAS IN TRUTH AND IN FACT, as the said KEVIN BURTON, ROBERT ALEXANDER, and CRAIG BOONE well knew, the licenses and checks presented were not legitimate and there were no funds available in the accounts set forth on said checks, all 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 NINETEEN

(Uttering a Forged Document - Third Degree)

KEVIN BURTON

ROBERT ALEXANDER

and

CRAIG BOONE

between on or about August 29, 2013 and on or about October 11, 2013, at the Borough of Hasbrouck Heights, in the County of Bergen, at the Township of West Caldwell, in the County of Essex, at the City of Edison, in the County of Middlesex, at the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, with purpose to defraud, or with knowledge that they were facilitating a fraud to be perpetrated by anyone, did utter a bank check knowing it to be forged in a matter specified in N.J.S.A. 2C:21-1a(2), contrary to the provisions of N.J.S.A. 2C:21-1a(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Eluding - Second Degree)

ROBERT ALEXANDER

on or about September 19, 2013, at the Township of Hillside, in the County of Union, elsewhere and within the jurisdiction of this Court, while operating a motor vehicle on a street or highway in this State, knowingly did flee or attempt to elude a police or law enforcement officer after having received a signal from such officer to bring that motor vehicle to a stop, that is, the said ROBERT ALEXANDER, did operate a motor vehicle on or near Coit Street and Lyons Avenue in Hillside, New Jersey, and having received a signal to bring that motor vehicle to a stop by Acting Detective Sergeant Jeovanny Rodriguez of the New Jersey State Police, did flee and attempt to elude Acting Detective Sergeant Rodriguez, and in doing so did operate the said motor vehicle in such a fashion as to create a risk of death or injury to another, contrary to the provisions of N.J.S.A. 2C:29-2b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Altering a Motor Vehicle Identification Number - Third Degree)

IBN TRAYNHAM

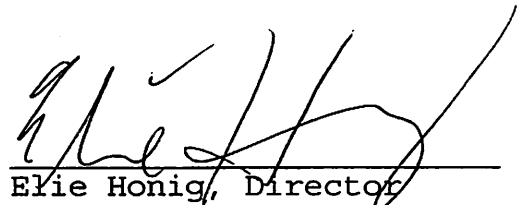
between on or about April 1, 2013 and July 26, 2013, at the City of Newark, in the County of Essex, and within the jurisdiction of this Court, knowingly did remove, alter, or change the motor vehicle identification number on motor vehicles for an unlawful purpose, contrary to the provisions of N.J.S.A. 2C:17-6, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Receiving Stolen Property - Third Degree)

IBN TRAYNHAM

on or about December 3, 2013, at the City of Newark, in the County of Essex, and within the jurisdiction of this Court, did commit theft by knowingly receiving or bringing into this State moveable property of another, that is, genuine New Jersey motor vehicle titles, knowing the same to be stolen or believing that they had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7, N.J.S.A. 2C:20-2b(2)(g), 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

Dated: 12-18-15

FILED

DEC 18 2014

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ659-14-9

Superior Court

Docket Number

14-12-00194-S

STATE OF NEW JERSEY)

v.)

LEON NII-MOI)

KYLE CHAMPAGNIE)

OMAR SMITH)

YVES AUGUSTIN)

SALADINE GRANT)

JAMES HEMPHILL)

DEMARCO SPARKS)

KOJO MARFO)

NATHANIEL BARNES)

ABDUR ABDULLAH)

KEVIN BURTON)

ROBERT ALEXANDER)

CRAIG BOONE)

TERRELL SAVAGE)

IBN TRAYNHAM)

MALIK BAKER)

JIM BRYANT, JR.)

JOHNNIE DAVILA)

KURTIS BOSSIE)

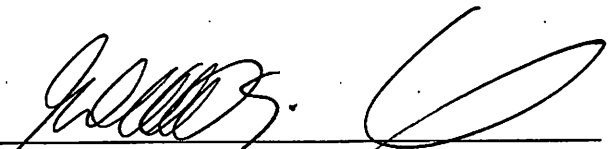
ORDER OF VENUE

AHMAD NASIDI)
ABDUL DAILEY III)
DANIEL HUNT)
STEVE MCGRAW)
KYLE BOTTS)
WOODY ARMAND)
and)
FATE LUCAS)

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

IT IS ORDERED on this 18th day of *December*, 2014, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Union 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 Union for filing.



Gerald J. Council, J.S.C.