

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

FILED

AUG 04 2017

State Grand Jury Judge

State Grand Jury

Number SGJ705-17-3

Superior Court

Docket Number

17-08-00133-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

SHAWN DAVIS)

TAMICA FREEMAN)

TRACY EDWARDS)

TRAITIANA EDWARDS)

TAIBIKA DAWSON)

WILLIAM HOLZENDORF)

RICARDO CRUZ)

JEROME PERSON)

WILLIE GREEN)

RUSH MARZAH)

KARL DAVIS, JR.)

DONOVAN VEREEN)

BREQUAN WOMACK)

JAQUAN BLAND)

GEORGE MARTZ)

ROBERT MINELLI)

PRINCE JONES)

ANGELICA MENDEZ)

and)

CHARLENE RODRIGUEZ)

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

COUNT ONE

(Leader of a Narcotics Trafficking Network - First Degree)

SHAWN DAVIS

between on or about December 15, 2016, and on or about May 10, 2017, at the City of Trenton and the Township of Hamilton, both in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with two or more persons as an organizer, supervisor, financier or manager of at least one other person, to engage for profit in a scheme or course of conduct to unlawfully manufacture, distribute, dispense, bring into or transport in this State cocaine, a Schedule II controlled dangerous substance, and/or heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-3, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Promoting Organized Street Crime - First Degree)

SHAWN DAVIS

between on or about December 15, 2016, and on or about May 10, 2017, at the City of Trenton and the Township of Hamilton, both in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier or manager, to commit one or more of the crimes enumerated in N.J.S.A. 2C:33-30, specifically, Leader of a Narcotics Trafficking Network, in violation of N.J.S.A. 2C:35-3, Distribution of Controlled Dangerous Substances in violation of N.J.S.A. 2C:35-5, and Unlawful Possession of a Weapon During the Commission of Certain Crimes, in violation of N.J.S.A. 2C:39-4.1, contrary to the provisions of N.J.S.A. 2C:33-30, N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Conspiracy - Second Degree)

TRACY EDWARDS

SHAWN DAVIS

WILLIAM HOLZENDORF

TAIBIKA DAWSON

RICARDO CRUZ

JEROME PERSON

WILLIE GREEN

RUSH MARZAH

TRAITIANA EDWARDS

KARL DAVIS, JR.

DONOVAN VEREEN

BREQUAN WOMACK

and

JAQUAN BLAND

who are named as defendants herein, 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 December 15, 2016, and on or about May 9, 2017, 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 Distribution of a Controlled Dangerous Substance, did agree

together and with a person whose identity is unknown to the Grand Jurors, who at all times relevant to this indictment was an agent of the New Jersey State Police, that:

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

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

1. Knowingly or purposely distribute a Controlled Dangerous Substance, that is, heroin, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1) and N.J.S.A. 2C:35-5c; or

2. Knowingly or purposely distribute a Controlled Dangerous Substance, that is, cocaine, in a quantity of more than one-half ounce but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2) and N.J.S.A. 2C:35-5c.

3. Knowingly or purposely distribute a Controlled Dangerous Substance, that is, heroin and/or cocaine, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of a public school used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7.

4. Knowingly or purposely distribute a Controlled Dangerous Substance, that is, heroin and/or cocaine, in

violation of N.J.S.A. 2C:35-5, while within 500 feet of a public park or public building, contrary to the provisions of N.J.S.A. 2C:35-7.1.

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

(Possession With Intent to Distribute a
Controlled Dangerous Substance - First Degree)

SHAWN DAVIS

and

TAMICA FREEMAN

on or about May 10, 2017, 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, heroin, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Possession With Intent to Distribute a
Controlled Dangerous Substance - First Degree)

SHAWN DAVIS

on or about May 10, 2017, at the Township of Hamilton, 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, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1), and against the peace of this State, the government and dignity of the same.

COUNT SIX

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

SHAWN DAVIS

on or about May 10, 2017, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Springfield XD 9mm semi-automatic handgun, serial number GM997344, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1a, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Possession of a Controlled Dangerous Substance - Third Degree)

SHAWN DAVIS

and

TAMICA FREEMAN

on or about May 10, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Possession of a Controlled Dangerous Substance - Third Degree)

SHAWN DAVIS

on or about May 10, 2017, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Distribution of a Controlled
Dangerous Substance - First Degree)

TRACY EDWARDS

between on or about December 15, 2016, and on or about May 6, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:35-5c, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Distribution of a Controlled
Dangerous Substance - Second Degree)

TRACY EDWARDS

between on or about April 25, 2017, and on or about May 9, 2017,
at the City of Trenton, in the County of Mercer, elsewhere, and
within the jurisdiction of this Court, knowingly or purposely
did distribute a controlled dangerous substance, that is,
cocaine, in a quantity of one-half ounce or more but less than
five ounces, including any adulterants or dilutants, contrary to
the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2),
N.J.S.A. 2C:35-5c, and against the peace of this State, the
government and dignity of the same.

COUNT ELEVEN

(Distribution of a Controlled
Dangerous Substance - Second Degree)

TRAITIANA EDWARDS

on or about January 27, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Distribution of a Controlled
Dangerous Substance - Second Degree)

TAIBIKA DAWSON

between on or about March 31, 2017, and on or about May 6, 2017,
at the City of Trenton, in the County of Mercer, elsewhere, and
within the jurisdiction of this Court, knowingly or purposely
did distribute a controlled dangerous substance, that is,
heroin, in a quantity of one-half ounce or more but less than
five ounces, including any adulterants or dilutants, contrary to
the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2),
N.J.S.A. 2C:35-5c, N.J.S.A. 2C:2-6, and against the peace of
this State, the government and dignity of the same.

COUNT THIRTEEN

(Distribution of a Controlled
Dangerous Substance - Second Degree)

TAIBIKA DAWSON

on or about May 6, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Unlawful Possession of a Weapon - Second Degree)

TRACY EDWARDS

and

WILLIAM HOLZENDORF

on or about April 14, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a FIE Corp. .25 caliber semi-automatic pistol, serial number 267924, 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, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

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

TRACY EDWARDS

and

WILLIAM HOLZENDORF

on or about April 14, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a FIE Corp. .25 caliber semi-automatic pistol, serial number 267924, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1a, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Manufacture, Transport, Disposition and Defacement of Weapons
and Dangerous Instruments and Appliances - Fourth Degree)

TRACY EDWARDS

and

WILLIAM HOLZENDORF

on or about April 14, 2017, at the City of Trenton, in the
County of Mercer, elsewhere, and within the jurisdiction of this
Court, knowingly did transport, sell or dispose of a firearm,
that is, a FIE Corp. .25 caliber semi-automatic pistol, serial
number 267924, without being licensed or registered to do so as
provided in Chapter 58, contrary to the provisions of N.J.S.A.
2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State,
the government and dignity of the same.

COUNT SEVENTEEN

(Distribution of a Controlled
Dangerous Substance - Third Degree)

WILLIAM HOLZENDORF

on or about April 14, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Distribution of a Controlled
Dangerous Substance - Third Degree)

RICARDO CRUZ

on or about April 25, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Distribution of a Controlled
Dangerous Substance - Third Degree)

RICARDO CRUZ

on or about April 25, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Unlawful Possession of a Weapon - Second Degree)

TRACY EDWARDS

on or about May 4, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Smith & Wesson .357 caliber six shot revolver, serial number K916205, 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, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

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

TRACY EDWARDS

on or about May 4, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Smith & Wesson .357 caliber six shot revolver, serial number K916205, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1a, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Manufacture, Transport, Disposition and Defacement of Weapons
and Dangerous Instruments and Appliances - Fourth Degree)

TRACY EDWARDS

on or about May 4, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did transport, sell or dispose of a firearm, that is, a Smith & Wesson .357 caliber six shot revolver, serial number K916205, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Distribution of a Controlled Dangerous Substance on or Within
1,000 Feet of School Property - Third Degree)

TRACY EDWARDS

and

TAIBIKA DAWSON

between on or about December 15, 2016, and on or about May 6, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of the Stokes Elementary School, which is owned or leased by the Trenton Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Distribution of a Controlled Dangerous Substance on or Within
1,000 Feet of School Property - Third Degree)

TRACY EDWARDS

on or about March 6, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of the Mott Elementary School, which is owned or leased by the Trenton Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Distribution of a Controlled Dangerous Substance on or Within
1,000 Feet of School Property - Third Degree)

TRACY EDWARDS

and

WILLIAM HOLZENDORF

on or about April 14, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of the Joyce Kilmer Elementary School, which is owned or leased by the Trenton Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Distribution of a Controlled Dangerous Substance on or Within
1,000 Feet of School Property - Third Degree)

TRACY EDWARDS

TAIBIKA DAWSON

and

RICARDO CRUZ

between on or about April 25, 2017, and on or about May 9, 2017,
at the City of Trenton, in the County of Mercer, elsewhere, and
within the jurisdiction of this Court, knowingly or purposely
did distribute a controlled dangerous substance, that is,
cocaine, in violation of N.J.S.A. 2C:35-5, while within 1,000
feet of the Stokes Elementary School, which is owned or leased
by the Trenton Board of Education and used for school purposes,
contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6,
and against the peace of this State, the government and dignity
of the same.

COUNT TWENTY-SEVEN

(Distribution of a Controlled Dangerous Substance on or Within
500 Feet of Certain Public Property - Second Degree)

TRACY EDWARDS

and

TRAITIANA EDWARDS

on or about January 27, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 500 feet of Shard Garden at Ontario Alley, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1, 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 Controlled Dangerous Substance - Third Degree)

TRACY EDWARDS

TRAITIANA EDWARDS

WILLIAM HOLZENDORF

TAIBIKA DAWSON

and

RICARDO CRUZ

between on or about April 25, 2017, and on or about May 6, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

TRACY EDWARDS

TAIBIKA DAWSON

and

RICARDO CRUZ

between on or about April 25, 2017, and on or about May 9, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

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

DONOVAN VEREEN

on or about April 28, 2017, 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, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Possession With Intent to Distribute a Controlled
Dangerous Substance on or Within 1,000 Feet
of School Property - Third Degree)

DONOVAN VEREEN

on or about April 28, 2017, 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, heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of Trenton High School West, which is owned or leased by the Trenton Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Possession With Intent to Distribute a Controlled
Dangerous Substance on or Within 500 Feet
of Certain Public Property - Second Degree)

DONOVAN VEREEN

on or about April 28, 2017, 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, heroin, in violation of N.J.S.A. 2C:35-5, while within 500 feet of Stacy Park and Cadwalader Park, both public parks, contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

DONOVAN VEREEN

on or about April 28, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Distribution of a Controlled
Dangerous Substance - Third Degree)

JAQUAN BLAND

on or about April 25, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Distribution of a Controlled Dangerous Substance on or
Within 1,000 Feet of School Property - Third Degree)

JAQUAN BLAND

on or about April 25, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of the Joyce Kilmer Elementary School, which is owned or leased by the Trenton Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Distribution of a Controlled Dangerous Substance on or
Within 500 Feet of Certain Public Property - Second Degree)

JAQUAN BLAND

on or about April 25, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 500 feet of Cadwalader Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SEVEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JAQUAN BLAND

and

GEORGE MARTZ

on or about April 25, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-EIGHT

(Distribution of a Controlled
Dangerous Substance - Third Degree)

BREQUAN WOMACK

between on or about April 6, 2017, and on or about April 12, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Distribution of a Controlled Dangerous Substance on or
Within 1,000 Feet of School Property - Third Degree)

BREQUAN WOMACK

between on or about April 6, 2017, and on or about April 12, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of the Daylight/Twilight High School, which is owned or leased by the Trenton Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Distribution of a Controlled Dangerous Substance on or
Within 500 Feet of Certain Public Property - Second Degree)

BREQUAN WOMACK

between on or about April 6, 2017, and on or about April 12, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 500 feet of the Trenton Public Library, a public building, contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-ONE

(Possession of a Controlled Dangerous Substance - Third Degree)

BREQUAN WOMACK

between on or about April 6, 2017, and on or about April 12, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

(Distribution of a Controlled
Dangerous Substance - Third Degree)

RUSH MARZAH

on or about April 23, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-THREE

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

ROBERT MINELLI

on or about April 23, 2017, 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, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

RUSH MARZAH

and

ROBERT MINELLI

on or about April 23, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FIVE

(Distribution of a Controlled
Dangerous Substance - Third Degree)

JEROME PERSON

on or about May 3, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SIX

(Distribution of a Controlled Dangerous Substance on or
Within 1,000 Feet of School Property - Third Degree)

JEROME PERSON

on or about May 3, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of Trenton High School, which is owned or leased by the Trenton Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SEVEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JEROME PERSON

on or about May 3, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-EIGHT

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

TRACY EDWARDS

on or about May 15, 2017, 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, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-NINE

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

RICARDO CRUZ

on or about May 15, 2017, 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, in a quantity of one ounce or more but less than five pounds, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(11), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY

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

TAIBIKA DAWSON

PRINCE JONES

ANGELICA MENDEZ

and

CHARLENE RODRIGUEZ

on or about May 15, 2017, 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, heroin, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-ONE

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

TAIBIKA DAWSON

PRINCE JONES

ANGELICA MENDEZ

and

CHARLENE RODRIGUEZ

on or about May 15, 2017, 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, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-TWO

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

TAIBIKA DAWSON

PRINCE JONES

ANGELICA MENDEZ

and

CHARLENE RODRIGUEZ

on or about May 15, 2017, 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, in a quantity of one ounce or more but less than five pounds, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(11), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-THREE

(Maintaining a Fortified Premises - Third Degree)

TAIBIKA DAWSON

PRINCE JONES

ANGELICA MENDEZ

and

CHARLENE RODRIGUEZ

on or about May 15, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did maintain a fortified structure to manufacture, distribute, or dispense a controlled dangerous substance, that is, heroin, and/or cocaine, and/or marijuana, in violation of N.J.S.A. 2C:35-5, by use of a wooden plank to secure the entry of the premises, contrary to the provisions of N.J.S.A. 2C:35-4.1c, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FOUR

(Certain Persons Not to Have Weapons - Second Degree)

SHAWN DAVIS

on or about May 10, 2017, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Fourth-Degree Aggravated Assault in Mercer County, on indictment number MER980300222I, and/or Second-Degree Possession of a Firearm for an Unlawful Purpose in Mercer County, on indictment number MER980300222I, and/or First-Degree Distribution/Possession With Intent to Distribute a Controlled Dangerous Substance in Mercer County, on indictment number MER070800118S, did own, possess or control the following firearm: a Springfield XD 9mm semi-automatic handgun, serial number GM997344, 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.

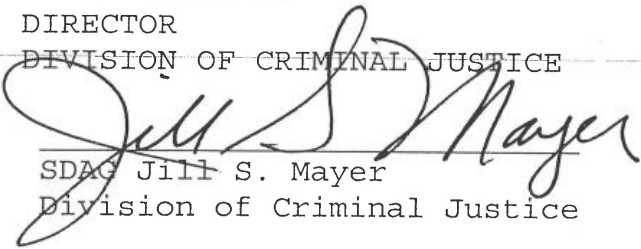
COUNT FIFTY-FIVE

(Unlawful Possession of a Handgun - First Degree)

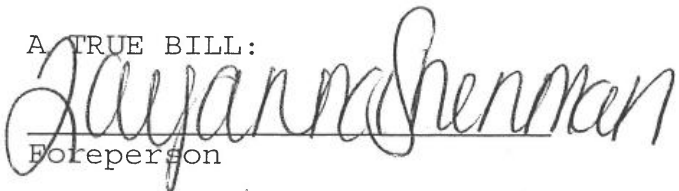
WILLIAM HOLZENDORF

on or about April 14, 2017, 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 First-Degree Carjacking in Mercer County, on indictment number MER970100050I, knowingly did possess a certain weapon, that is, a FIE Corp. .25 caliber semi-automatic pistol, serial number 267924, 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, N.J.S.A. 2C:39-5j, and against the peace of this State, the government and dignity of the same.

AAG ELIE HONIG
DIRECTOR
DIVISION OF CRIMINAL JUSTICE


BY: SDAG Jill S. Mayer
Division of Criminal Justice

A TRUE BILL:


Foreperson

Date: 8/4/17

FILED
AUG 04 2017
State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ705-17-3
Superior Court
Docket Number 17-08-00133-S

STATE OF NEW JERSEY)
v.)
SHAWN DAVIS)
TAMICA FREEMAN)
TRACY EDWARDS)
TRAITIANA EDWARDS)
TAIBIKA DAWSON)
WILLIAM HOLZENDORF)
RICARDO CRUZ)
JEROME PERSON)
WILLIE GREEN)
RUSH MARZAH)
KARL DAVIS, JR.)
DONOVAN VEREEN)
BREQUAN WOMACK)
JAQUAN BLAND)
GEORGE MARTZ)

ORDER OF VENUE

ROBERT MINELLI)
PRINCE JONES)
ANGELICA MENDEZ)
and)
CHARLENE RODRIGUEZ)

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

IT IS ORDERED on this *4th* day of *August*, 2017, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer 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 Mercer for filing.

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

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