FILED

FEB 20 2018

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury Number <u>SGJ712-18-16</u> Superior Court 18-02-00028-S Docket Number

STATE OF NEW JERSEY)

)

AHMED ANTHONY

v.

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

COUNT ONE

(Conspiracy - First Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, in the County of Essex; elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Carjacking, Robbery, Burglary, Theft by Unlawful Taking, and Receiving Stolen Property, did agree with others that:

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

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

1. Carjacking- one or more of them did knowingly or purposely

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threaten an occupant or person in control of a motor vehicle, or to put them in fear of immediate bodily injury, or threaten immediately to commit the crime of murder, 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(2)and(3); and

2. Robbery- one or more of them did knowingly or purposely threaten another with, or put another in fear of, immediate bodily injury, or threaten immediately to commit the crime of murder, while in the course of committing a theft, while one or more of them were armed with or threatened the immediate use of a deadly weapon, contrary to the provisions of N.J.S.A. 2C:-15-1(a) and (b); and

3. Burglary- one or more of them 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, or threaten to inflict bodily injury on anyone, contrary to the provisions of N.J.S.A. 2C:18-2b(1) and b(2); and

4. Theft by Unlawful Taking- one or more of them did knowingly or purposely unlawfully exercise control over moveable property of another, having a value in excess of \$75,000 with purpose to deprive owners thereof, contrary to the provisions of N.J.S.A. 2C:20-3a; and

5. Receiving Stolen Property- one or more of them did knowingly or purposely commit theft by receiving or bringing into this State moveable property of another having a value in excess of \$75,000.00, knowing the same to be stolen or believing that it had probably been

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stolen, contrary to the provisions of N.J.S.A. 2C:20-7(a).

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 TWO

(Carjacking-First Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, 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, that is a Land Rover Range Rover, N.J. Registration T38JJA, knowingly did threaten V.Z. or A.Z with, or purposely or knowingly did put V.Z. or A.Z. in fear of immediate bodily injury, or threaten to immediately commit the murder of A.Z., contrary to the provisions of <u>N.J.S.A</u>. 2C:15-2a(2), <u>N.J.S.A.</u> 2C:15-2a(3), <u>N.J.S.A</u>. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Carjacking-First Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, 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, that is a Land Rover Range Rover, N.J. Registration E47HBL, knowingly did threaten V.Z. or A.Z with, or purposely or knowingly did put V.Z. or A.Z. in fear of immediate bodily injury, or threaten to immediately commit the murder of A.Z., contrary to the provisions of <u>N.J.S.A</u>. 2C:15-2a(2), <u>N.J.S.A.</u> 2C:15-2a(3), <u>N.J.S.A</u>. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Robbery-First Degree)

AHMED ANTHONY

and other individuals whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, in the County of Essex, elsewhere, and within the jurisdiction of this Court in the course of committing a theft, knowingly did threaten V.Z. with, or purposely did put V.Z. in fear of immediate bodily injury, or threaten to immediately commit the murder of A.Z., while one or more of them was armed with or threatened the use of a deadly weapon, that is, a handgun, contrary to the provisions of <u>N.J.S.A.</u> 2C:15-1a(2), <u>N.J.S.A.</u> 2C:15-1a(3), <u>N.J.S.A.</u> 2C:15-1b, <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Robbery-First Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, in the County of Essex, elsewhere, and within the jurisdiction of this Court while in the course of committing a theft, knowingly did threaten A.Z. with, or purposely did put A.Z. in fear of immediate bodily injury, or threaten to immediately commit the murder of A.Z., while one or more of them was armed with or threatened the use of a deadly weapon, that is, a handgun, contrary to the provisions of <u>N.J.S.A.</u> 2C:15-1a(2), <u>N.J.S.A.</u> 2C:15-1a(3), <u>N.J.S.A.</u> 2C:15-1b, <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Kidnapping-Second Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did unlawfully confine A.Z. with the purpose of holding A.Z. for ransom or reward, contrary to the provisions of <u>N.J.S.A.</u> 2C:13-1a, <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Burglary-Second Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly enter a motor vehicle, that is a Land Rover Range Rover, N.J. Registration T38JJA, with the purpose to commit an offense therein, and in the course of committing the said offense, was armed with or displaying what appeared to be a deadly weapon, or purposely or knowingly threatened to inflict bodily injury on A.Z., contrary to the provisions of <u>N.J.S.A.</u> 2C:18-2a(1), <u>N.J.S.A.</u> 2C:18-2b(1), <u>N.J.S.A.</u>, 2C:18-2b(2), <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Burglary-Second Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly enter a motor vehicle, that is a Land Rover Range Rover, N.J. Registration E47HBL, with the purpose to commit an offense therein, and in the course of committing the said offense, was armed with or displaying what appeared to be a deadly weapon, or purposely or knowingly threatened to inflict bodily injury on A.Z., contrary to the provisions of <u>N.J.S.A.</u> 2C:18-2a(1), <u>N.J.S.A.</u> 2C:18-2b(1), <u>N.J.S.A.</u>, 2C:18-2b(2), <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Terroristic Threats-Third Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did threaten to kill A.Z. with the purpose to put A.Z. in imminent fear of death under circumstances reasonably causing A.Z. to believe the immediacy of the threat and the likelihood that it will be carried out, contrary to the provisions of <u>N.J.S.A.</u> 2C:12-3b, <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Receiving Stolen Property - Second Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Milburn, in the County of Essex, 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 <u>N.J.S.A.</u> 2C:20-7, <u>N.J.S.A.</u> 2C:20-2, <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Theft by Unlawful Taking - Second Degree)

AHMED ANTHONY

and other persons whose identities are unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 27, 2017, at the Town of Millburn, in the County of Essex, 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 <u>N.J.S.A.</u> 2C:20-3a, <u>N.J.S.A.</u> 2C:20-2, <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same

AAG Elie Honig, Director

Division of Criminal Justice

True Bill: Foreperson Dated:

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FEB 2 0 2018 State Grand Jury Judge SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL State Grand Jury Number <u>SGJ712-18-16</u> Superior Court Docket Number <u>18-02-000</u>2**8**-5

STATE	OF	NEW	JERSEY)				
		v.)	ORDER	OF		
AHMED	ANI	THONY	ζ)		ORDER	01	VENUE

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

IT IS ORDERED on this 20th day of February, 2018, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Essex 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 Essex for filing.

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