

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

FILED

JUN 06 2018

State Grand Jury Judge

State Grand Jury

Number SGJ718-18-2-S

Superior Court

Docket Number 18-06-00087-S

STATE OF NEW JERSEY)

v.)

JAUDEL REESE)

ERIC HUNTINGTON)

JEROME DEAS)

JESSE GARCIA)

MARVELOUS PITTS)

HERBERT PITTS)

JUSTIN JONES)

ANGELA WHITEHEAD)

MARKEITH DAVIS)

SHAQUES HUNTINGTON)

JONATHAN CEDENO)

TARIQ JACKSON)

HANIFE DOCK)

ISAAC COLEMAN)

JEFFREY HUNTER)

THEODORE BLACKSHEAR)

DEVON ARMSTRONG)

SUPERCEDING INDICTMENT

JASMINE SOTO)
CHRISTOPHER GUTIRREZ)
FRANK MARCHIONNI)
JONATHON KLEINBERG)
CHELSEA ROUSE)
JENNIFER HALTERMAN)
BRENT HOWELL)
ROBERT FERRI)
MICHAEL ARMAO)
MICHAEL SHERIDAN)
DAVID BORALSKY)
DANIEL GRIMM)
MICHAEL RYERSON)
CARL MCKENITH)
NICHOLAS MCLAUGHLIN)
[REDACTED])
AND)
CHRISTOPHER HOLBERT

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

COUNT ONE

(Conspiracy-Second Degree)

JAUMEL REESE

ERIC HUNTINGTON
JEROME DEAS
JESSE GARCIA
MARVELOUS PITTS
HERBERT PITTS
JUSTIN JONES
ANGELA WHITEHEAD
MARKEITH DAVIS
SHAQUES HUNTINGTON
JONATHAN CEDENO
TARIQ JACKSON
HANIFE DOCK
ISAAC COLEMAN
JEFFREY HUNTER
THEODORE BLACKSHEAR
AND
DEVON ARMSTRONG

who are named as the defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about May 24, 2017, and on or about November 16, 2017, at the City of Paterson, at the Borough of Prospect Park, both in the County of Passaic, 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 that:

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

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

1. Knowingly or purposely distribute a controlled dangerous substance, that is, heroin and/or cocaine, in a quantity of one-half ounce 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;

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

(Promoting Organized Street Crime- First Degree)

JAUMEL REESE

between on or about July 19, 2017, and on or about November 14, 2017, at the City of Paterson, at the Borough of Prospect Park, both in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly conspired with others as an organizer, supervisor, financier or manager to distribute a controlled dangerous substance, that is, heroin, in a quantity of one half ounce or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5, in violation of N.J.S.A. 2C:33-30, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Distribution of a Controlled Dangerous Substance - Second Degree)

JAUMEL REESE

between on or about July 19, 2017, and on or about October 27, 2017, at the City of Paterson, at the Borough of Prospect Park, both in the County of Passaic, 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 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Employing a Juvenile in a Drug Distribution Scheme- Second Degree)

JAUMEL REESE

on or about August 9, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been at least eighteen years of age, knowingly or purposely did use, solicit, direct, hire or employ a person seventeen years of age or younger, specifically, a juvenile male, R.S., to violate N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:35-6, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Distribution of a Controlled Dangerous Substance - First Degree)

ERIC HUNTINGTON

between on or about May 31, 2017, and on or about November 14, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Distribution of a Controlled Dangerous Substance - Third Degree)

ERIC HUNTINGTON

between on or about May 31, 2017, and on or about November 14, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Distribution of a Controlled Dangerous Substance within 1000 Feet of School Property - Third Degree)

ERIC HUNTINGTON

between on or about May 31, 2017, and on or about September 14, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin and/or cocaine, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, and/or Eastside High School, contrary to the provisions of N.J.S.A. 2C:35-7, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Distribution of a Controlled Dangerous Substance - Third Degree)

HERBERT PITTS

AND

THEODORE BLACKSHEAR

on or about May 24, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

HERBERT PITTS

AND

THEODORE BLACKSHEAR

on or about May 24, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Distribution of a Controlled Dangerous Substance within 1000
Feet of School Property - Third Degree)

HERBERT PITTS

AND

THEODORE BLACKSHEAR

on or about May 24, 2017, at the City of Paterson, in the County
of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, heroin, within 1000 feet of
property owned by the Paterson Board of Education and used for
school purposes, that is Public School No. 10, contrary to the
provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against
the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Distribution of a Controlled Dangerous Substance - Second Degree)

HERBERT PITTS

MARVELOUS PITTS

AND

DEVON ARMSTRONG

on or about May 31, 2017, at the City of Paterson, in the County of Passaic, 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, including any adulterants and 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:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Possession of a Controlled Dangerous Substance - Third Degree)

HERBERT PITTS

ERIC HUNTINGTON

MARVELOUS PITTS

AND

DEVON ARMSTRONG

on or about May 31, 2017, at the City of Paterson, in the County of Passaic, 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 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 within 1000
Feet of School Property - Third Degree)

HERBERT PITTS

MARVELOUS PITTS

AND

DEVON ARMSTRONG

on or about May 31, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Distribution of a Controlled Dangerous Substance - Second Degree)

MARVELOUS PITTS

on or about July 7, 2017, at the City of Paterson, in the County of Passaic, 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, including any adulterants and 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:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

ERIC HUNTINGTON

AND

MARVELOUS PITTS

on or about July 7, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Distribution of a Controlled Dangerous Substance within 1000 Feet of School Property - Third Degree)

MARVELOUS PITTS

on or about July 7, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

ERIC HUNTINGTON

AND

JAUMEL REESE

between on or about July 19, 2017, and on or about July 28, 2017, at the City of Paterson, in the County of Passaic, 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 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)

HERBERT PITTS

AND

JUSTIN JONES

on or about August 10, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

HERBERT PITTS

AND

JUSTIN JONES

on or about August 10, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Distribution of a Controlled Dangerous Substance - Second Degree)

ANGELA WHITEHEAD

on or about August 30, 2017, at the City of Paterson, at the Borough of Prospect Park, both in the County of Passaic, 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, including any adulterants and 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:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY ONE

(Possession of a Controlled Dangerous Substance - Third Degree)

JAUMEL REESE

AND

ANGELA WHITHEAD

on or about August 30, 2017, at the City of Paterson, at the Borough of Prospect Park, both in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY TWO

(Distribution of a Controlled Dangerous Substance within 1000 Feet of School Property - Third Degree)

JAUMEL REESE

AND

ANGELA WHITHEAD

on or about May 31, 2017, at the City of Paterson, at the Borough of Prospect Park, both in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Prospect Park Board of Education and used for school purposes, that is Al Hikmah Elementary School, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY THREE

(Distribution of a Controlled Dangerous Substance - Third Degree)

HERBERT PITTS

on or about September 22, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

HERBERT PITTS

AND

JAUMEL REESE

on or about September 22, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY FIVE

(Distribution of a Controlled Dangerous Substance within 1000
Feet of School Property - Third Degree)

HERBERT PITTS

AND

JAUMEL REESE

on or about September 22, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY SIX

(Distribution of a Controlled Dangerous Substance - Third Degree)

JEFFREY HUNTER

between on or about August 8, 2017, and on or about October 25, 2017, at the City of Paterson, in the County of Passaic, 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 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 within 1000 Feet of School Property - Third Degree)

JEFFREY HUNTER

between on or about August 8, 2017, and on or about October 5, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY EIGHT

(Possession of a Controlled Dangerous Substance - Third Degree)

JEFFREY HUNTER

JASMINE SOTO

AND

CHRISTOPHER GUTIRREZ

on or about August 8, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, 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)

JEFFREY HUNTER

FRANK MARCHIONNI

AND

JONATHON KLEINBERG

on or about October 5, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Possession of a Controlled Dangerous Substance - Third Degree)

JEFFREY HUNTER

CHELSEA ROUSE

AND

JENNIFER HALTERMAN

on or about October 25, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY ONE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MARKEITH DAVIS

on or about October 7, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY TWO

(Distribution of a Controlled Dangerous Substance within 1000 Feet of School Property - Third Degree)

MARKEITH DAVIS

on or about and October 7, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

ERIC HUNTINGTON

AND

BRENT HOWELL

on or about October 5, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

ERIC HUNTINGTON

MARKEITH DAVIS

AND

ROBERT FERRI

on or about October 7, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY FIVE

(Possession of a Controlled Dangerous Substance - Third Degree)

ERIC HUNTINGTON

MICHAEL ARMAO

AND

MICHAEL SHERIDAN

on or about October 7, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY SIX

(Distribution of a Controlled Dangerous Substance - Third Degree)

SHAQUES HUNTINGTON

between on or about October 26, 2017, and on or about October 31, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY SEVEN

(Distribution of a Controlled Dangerous Substance within 1000 Feet of School Property - Third Degree)

SHAQUES HUNTINGTON

between on or about October 26, 2017, and on or about October 31, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY EIGHT

(Possession of a Controlled Dangerous Substance - Third Degree)

SHAQUES HUNTINGTON

AND

DAVID BORALSKY

on or about October 26, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

SHAQUES HUNTINGTON

AND

DANIEL GRIMM

on or about October 31, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Distribution of a Controlled Dangerous Substance - Third Degree)

JEROME DEAS

Between on or about October 26, 2017, and on or about October 27, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY ONE

(Possession of a Controlled Dangerous Substance - Third Degree)

JEROME DEAS

AND

MICHAEL RYERSON

on or about October, 26, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY TWO

(Distribution of a Controlled Dangerous Substance within 1000
Feet of School Property - Third Degree)

JEROME DEAS

AND

JAUMEL REESE

on or about October 27, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

JEROME DEAS

JAUMEL REESE

AND

CARL MCKENITH

on or about October, 27, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY FOUR

(Distribution of a Controlled Dangerous Substance - Third Degree)

JONATHON CEDENO

on or about November 4, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY FIVE

(Distribution of a Controlled Dangerous Substance within 1000
Feet of School Property - Third Degree)

JONATHON CEDENO

on or about November 4, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY SIX

(Possession of a Controlled Dangerous Substance - Third Degree)

JONATHON CEDENO

NICHOLAS MCLAUGHLIN

AND

CHRISTOPHER HOLBERT

on or about November 4, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY SEVEN

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

TARIQ JACKSON

on or about October 21, 2017, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
*this Court, knowingly or purposely did possess with the 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 N.J.S.A. 2C:2-6, 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 within 1000 Feet of School Property - Third Degree)

TARIQ JACKSON

on or about October 21, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, within 1000 feet of property owned by the Paterson Board of Education and used for school purposes, that is Public School No. 10, contrary to the provisions of N.J.S.A. 2C:35-7, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY NINE

(Eluding - Fourth Degree)

TARIQ JACKSON

on or about October 21, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, purposely did prevent Detective Robert Kilmurray, a law enforcement officer of the New Jersey State Police from effecting his arrest by flight, contrary to the provisions of N.J.S.A. 2C:29-2(a)(3), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY

(Possession of a Controlled Dangerous Substance - Third Degree)

JEROME DEAS

on or about November 16, 2017, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY ONE

(Possession of a Controlled Dangerous Substance - Third Degree)



on or about November 16, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, codeine, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY TWO

(Possession of False Government Documents - Fourth Degree)



on or about November 16, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a false document or other writing, namely, false military identification cards, which could be used as a means of verifying a person's identity, age, or other identifying information, contrary to the provisions of N.J.S.A. 2C:21.2.1(d), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY THREE

(Conspiracy- Second Degree)

JEROME DEAS

AND

HERBERT PITTS

who are named as the defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about November 15, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of unlawful possession of a weapon, and unlawful disposition of a weapon, did agree that:

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

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

1. knowingly possess a firearm, that is, .38 caliber Smith & Wesson Airweight Revolver, bearing serial number DAX9830, and/or .40 Caliber Taurus "The Judge", bearing serial number C0765975, without first having obtained a permit to carry the same, as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and

2. knowingly manufacture, ship, transport, sell or

dispose of a weapon, that is, a .38 caliber Smith & Wesson Airweight Revolver, bearing serial number DAX9830, and/or .40 Caliber Taurus "The Judge", bearing serial number C0765975, without first having obtained a license to do so, as provided in N.J.S.A. 2C:58-1 et. seq. , contrary to the provisions of N.J.S.A. 2C:39-9d.

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 FIFTY FOUR

(Unlawful Possession of a Firearm - Second Degree)

JEROME DEAS

AND

HERBERT PITTS

on or about November 15, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, .38 caliber Smith & Wesson Airweight Revolver, bearing serial number DAX9830, and/or .40 Caliber Taurus "The Judge", bearing serial number C0765975, without first having obtained a permit to carry the same, as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY FIVE

(Unlawful Disposition of a Weapon - Fourth Degree)

JEROME DEAS

AND

HERBERT PITTS

on or about November 15, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture, ship, transport, sell or dispose of a weapon, that is, a .38 caliber Smith & Wesson Airweight Revolver, bearing serial number DAX9830, and/or .40 Caliber Taurus "The Judge", bearing serial number C0765975, without first having obtained a license to do so, as provided in N.J.S.A. 2C:58-1 et. seq. , contrary to the provisions of N.J.S.A. 2C:39-9d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY SIX

(Receiving Stolen Property - Third Degree)

JEROME DEAS

AND

HERBERT PITTS

on or about November 15, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did receive or bring into the state movable property of another, namely a firearm, that is a .40 Caliber Taurus "The Judge", bearing serial number C0765975, knowing the same to be stolen, or believing that it had probably been stolen, contrary to the provision of N.J.S.A. 2C:20-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY SEVEN

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

JESSE GARCIA

on or about November 14, 2017, at the Borough of Lodi, in the
County of Bergen, 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, 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 EIGHT

(Possession of a Controlled Dangerous Substance - Third Degree)

JESSE GARCIA

on or about November 14, 2017, at the Borough of Lodi, in the County of Bergen, 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:35-10(a) (1), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY NINE

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

JESSE GARCIA

on or about November 14, 2017, at the Borough of Lodi, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a black semi-automatic Hi-Point .45 caliber handgun, bearing serial number 339844, 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:39-4.1, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY

(Money Laundering - Third Degree)

JESSE GARCIA

on or about November 14, 2017, at the Borough of Lodi, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, the said JESSE GARCIA, did possess approximately \$19,235 in United States Currency, known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY ONE

(Possession of a Weapon by a Convicted Person - Second Degree)

JESSE GARCIA

on or about November 18, 2017, at the Borough of Lodi, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Possession of CDS with Intent to Distribute within 1000 Feet of School Property, under Passaic County Indictment 09-01-00537-I and/or Passaic County Indictment 10-01-00401-I, did purchase, own, possess or control a firearm, that is, a black semi-automatic Hi-Point .45 caliber handgun, bearing serial number 33984475, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY TWO

(Possession of a Weapon by a Convicted Person - Second Degree)

JEROME DEAS

on or about November 15, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Possession of CDS with Intent to Distribute within 1000 feet of School Property, under Passaic County Indictment 04-05-00227-I and/or Passaic County Indictment 00-01-00054-I, and/or Passaic County Indictment 99-06-00675-I, did purchase, own, possess or control a firearm, that is, .38 caliber Smith & Wesson Airweight Revolver, bearing serial number DAX9830, and/or .40 caliber Taurus "The Judge", bearing serial number C0765975, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-THREE

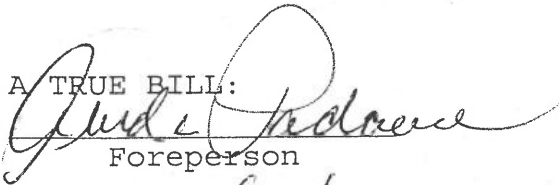
(Possession of a Weapon by a Convicted Person - Second Degree)

HERBERT PITTS

on or about November 15, 2017, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Burglary, under Passaic County Indictment 88-04-00717-I, and/or Aggravated Assault, under Passaic County Indictment 90-03-00271-I, and/or Possession with Intent to Distribute a Controlled Dangerous Substance within 1000 feet of School Property, under Passaic County Indictment 05-05-00718-I and/or 05-06-00791-I, did purchase, own, possess or control a firearm, that is, .38 caliber Smith & Wesson Airweight Revolver, bearing serial number DAX9830, and/or .40 caliber Taurus "The Judge", bearing serial number C0765975, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

AAG Veronica Allende
Director
Division of Criminal Justice

A TRUE BILL:


Foreperson

Dated: 6/16/18



FILED

JUN 06 2018

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ718-18-2-S

Superior Court

Docket Number 18-06-00087-S

STATE OF NEW JERSEY)

v.)

JAUMEL REESE)

ERIC HUNTINGTON)

JEROME DEAS)

JESSIE GARCIA)

MARVELOUS PITTS)

HERBERT PITTS)

JUSTIN JONES)

ANGELA WHITEHEAD)

MARKEITH DAVIS)

SHAQUES HUNTINGTON)

JONATHAN CEDENO)

TARIQ JACKSON)

HANIF DOCK)

ISSAC COLEMAN)

JEFFREY HUNTER)

THEODORE BLACKSHEAR)

DEVON ARMSTRONG)

ORDER OF VENUE

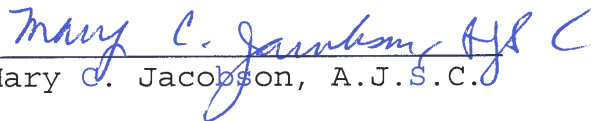
JASMINE SOTO)
CHRISTOPHER GUTIRREZ)
FRANK MARCHIONI)
JEFFREY KLEINBERG)
CHELSEA ROUSE)
JENNIFER HALTERMAN)
BRETT HOWELL)
ROBERT FERRI)
MICHAEL ARMAO)
MICHAEL SHERIDAN)
DAVID BORALSKY)
DAVID GRIMM)
MICHAEL RYERSON)
CARL MCKENETH)
NICHOLAS MCLAUGHLIN)
[REDACTED])
AND)
CHRISTOPHER HOLBERT)

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

IT IS ORDERED on this 6th day of June, 2018, pursuant to paragraph 8 of the State Grand Jury Act, that the

County of Passaic 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 Passaic for filing.


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