SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ698-17-17

Superior Court Docket Number

17-05-00094-S

FILED

MAY 3 1 2017

State Grand Jury Judge

STATE OF NEW JERSEY KEVIN CLAYTON INDICTMENT ALJUOUAN THOMASON YASIM SMITH NYREEK LOYAL JAHOB LOYAL NAIM STEWART YASIN HAMILTON Quashyne Seburn TERRANCE SHELLS ABDUL BRYANT KEVIN LOYAL LYONEL FINKLEA TYREE OXFORD BRYANT HAWKINS ELIJAH EVANS DARNELL COGMAN CHARLIE JONES JAHWON CHRISTIAN RAMON FINKLEA TYRE SORBINO RAMADAN DANIELS BISHOP JACKSON TYREE WILLIAMS WALI JOHNSON

ALQUAN SHELLS John Doe, known as "Sid" AND

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JOHN DOE, KNOWN AS "SHA"
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The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

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COUNT ONE

(Conspiracy - Second Degree)

Kevin Clayton

Aljuquan Thomason

Yasim Smith

Nyreek Loyal

Jahob Loyal

Naim Stewart

Yasin Hamilton

Quashyne Seburn

Terrance Shells

Abdul Bryant

Kevin Loyal

Lyonel Finklea

Tyree Oxford

Bryant Hawkins

Elijah Evans

Darnell Cogman

Charlie Jones

Jahwon Christian

Ramon Finklea

Tyre Sorbino

Ramadan Daniels

Bishop Jackson

Tyree Williams

Wali Johnson

Alquan Shells

John Doe, known as "Sid".

and

John Doe, known as "Sha"

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 March 3, 2016 and on or about June 28, 2016, at the City of Newark, 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 Possession with Intent to Distribute a Controlled Dangerous Substance, Possession with Intent to Distribute and/or Distribution within 1,000 feet of School Property, Possession with Intent to Distribute and/or Distribution within 500 feet of a Public Property, and Distribution of a Controlled Dangerous Substance, did agree 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 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(2) and N.J.S.A. 2C:35-5c; and
- 2. Knowingly 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(2) and N.J.S.A. 2C:35-5c;
- 3. Knowingly possess with intent to distribute a controlled dangerous substance, that is fentanyl, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5) and N.J.S.A. 2C:35-5c; and
- 4. Knowingly distribute a controlled dangerous substance, that is, fentanyl, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5c;
- 5. Knowingly possess with intent to distribute a controlled dangerous substance, that is heroin and/or fentanyl, in violation of N.J.S.A. 2C:35-5a(1), within 1,000 feet of the Miller Elementary School and/or Louise A. Spencer Elementary School, which are owned by or leased to the Newark Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7; and
- 6. Knowingly possess with intent to distribute and/or distribute a controlled dangerous substance, that is heroin and/or fentanyl, in violation of N.J.S.A. 2C:35-5a(1), within 500 feet of the Jesse Allen Park, contrary to the provisions of N.J.S.A. 2C:35-7.1.

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

COUNT TWO

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

Kevin Clayton

and

Nyreek Loyal

on or about March 3, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Kevin Clayton

and

Nyreek Loyal

on or about March 3, 2016, at the City of Newark, in the County of Essex, 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 FOUR

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Kevin Clayton

and

Nyreek Loyal

on or about March 3, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 FIVE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Kevin Clayton

and

Nyreek Loyal

on or about March 3, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Unlawful Possession of a Weapon - Second Degree)

Kevin Clayton

on or about January 20, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Glock Model 33 .357 caliber semi-automatic handgun bearing serial number FPY267, 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 SEVEN

(Unlawful Possession of a Large Capacity Ammunition Magazine - Fourth Degree)

Kevin Clayton

on or about January 20, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3j, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Money Laundering - Third Degree)

Kevin Clayton

on or about January 20, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property, in an amount less than \$75,000, known or which a reasonable person would believe to be derived from criminal activity, that is, KEVIN CLAYTON did transport or possess property, in an amount of approximately \$3,164 in U.S. 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:21-25(a), and against the peace of this State, the government and dignity of the same.

COUNT NINE

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

Kevin Clayton

on or about April 26, 2016, at the City of Newark, in the County of Essex, 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 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 - Third Degree)

Kevin Clayton

on or about April 26, 2016, at the City of Newark, in the County of Essex, 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 ELEVEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Kevin Clayton

on or about April 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 TWELVE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Kevin Clayton

on or about April 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Promoting Organized Street Crime - First Degree)

Kevin Clayton

between on or about March 3, 2016 and on or about April 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did conspire with others as an organizer, supervisor, financier or manager to commit the crimes of possession with intent to distribute controlled dangerous substances, in violation of N.J.S.A. 2C:35-5, and/or distribution of controlled dangerous substances within 1,000 feet of a school, in violation of N.J.S.A. 2C:35-7, and/or distribution of controlled dangerous substances within 500 feet of a public park, in violation of N.J.S.A. 2C:35-7.1a, contrary to the provisions of N.J.S.A. 2C:33-30, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

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

Yasim Smith

and

Aljuquan Thomason

on or about March 4, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

Yasim Smith

and

Aljuquan Thomason

on or about March 4, 2016, at the City of Newark, in the County of Essex, 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 SIXTEEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Yasim Smith

and

Aljuquan Thomason

on or about March 4, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark 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 SEVENTEEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property - Second Degree)

Yasim Smith

and

Aljuquan Thomason

on or about March 4, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

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

Nyreek Loyal

and

Aljuquan Thomason

on or about March 7, 2016, at the City of Newark, in the County of Essex, 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 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)

Nyreek Loyal

and

Aljuquan Thomason

on or about March 7, 2016, at the City of Newark, in the County of Essex, 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

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Nyreek Loyal

and

Aljuquan Thomason

on or about March 7, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 ONE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Nyreek Loyal

and

Aljuquan Thomason

on or about March 7, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a 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

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

Yasim Smith

Yasin Hamilton

and

Nyreek Loyal

on or about March 9, 2016, at the City of Newark, in the County of Essex, 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 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)

Yasim Smith

Yasin Hamilton

and

Nyreek Loyal

on or about March 9, 2016, at the City of Newark, in the County of Essex, 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

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Yasim Smith

Yasin Hamilton

and

Nyreek Loyal

on or about March 9, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 FIVE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Yasim Smith

Yasin Hamilton

and

Nyreek Loyal

on or about March 9, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a 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

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

Yasim Smith

and

Ramadan Daniels

on or about May 16, 2016, at the City of Newark, in the County of Essex, 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 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 - Third Degree)

Yasim Smith

and

Ramadan Daniels

on or about May 16, 2016, at the City of Newark, in the County of Essex, 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 EIGHT

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Yasim Smith

and

Ramadan Daniels

on or about May 16, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 NINE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Yasim Smith

and

Ramadan Daniels

on or about May 16, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a 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 with the Intent to Distribute a Controlled Dangerous Substance - Third Degree)

Jahob Loyal

on or about May 26, 2016, at the City of Newark, in the County of Essex, 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) and 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

(Distribution of a Controlled Dangerous Substance - Third Degree)

Jahob Loyal

on or about May 26, 2016, at the City of Newark, in the County of Essex, 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) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY TWO.

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Jahob Loyal

on or about May 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark 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 THREE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Jahob Loyal

on or about May 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY FOUR

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

Jahob Loyal

and

John Doe, known as "Sid"

on or about April 6, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Jahob Loyal

and

John Doe, known as "Sid"

on or about April 6, 2016, at the City of Newark, in the County of Essex, 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 SIX

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Jahob Loyal

and

John Doe, known as "Sid"

on or about April 6, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 SEVEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property - Second Degree)

Jahob Loyal

and

John Doe, known as "Sid"

on or about April 6, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a 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 with the Intent to Distribute a Controlled Dangerous Substance - Third Degree)

Naim Stewart

on or about March 9, 2016, at the City of Newark, in the County of Essex, 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) and 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 - Third Degree)

Naim Stewart

on or about March 9, 2016, at the City of Newark, in the County of Essex, 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) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Naim Stewart

on or about March 9, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark 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 ONE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Naim Stewart

on or about March 9, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a, and against the peace of this State, the government and dignity of the same.

COUNT FORTY TWO

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

Yasin Hamilton

between on or about April 26, 2016 and on or about May 2, 2016, at the City of Newark, in the County of Essex, 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(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 FORTY THREE

(Distribution of a Controlled Dangerous Substance - Second Degree)

Yasin Hamilton

between on or about April 26, 2016 and on or about May 2, 2016, at the City of Newark, in the County of Essex, 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(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 FORTY FOUR

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Yasin Hamilton

between on or about April 26, 2016 and on or about May 2, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 FIVE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property - Second Degree)

Yasin Hamilton

between on or about April 26, 2016 and on or about May 2, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a 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 with the Intent to Distribute a Controlled Dangerous Substance - Third Degree)

Quashyne Seburn

on or about March 16, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY SEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

Quashyne Seburn

on or about March 16, 2016, at the City of Newark, in the County of Essex, 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 EIGHT

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Quashyne Seburn

on or about March 16, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Quashyne Seburn

on or about March 16, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY

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

Quashyne Seburn

and

Bryant Hawkins

on or about April 27, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY ONE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Quashyne Seburn

and

Bryant Hawkins

on or about April 27, 2016, at the City of Newark, in the County of Essex, 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 FIFTY TWO

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Quashyne Seburn

and

Bryant Hawkins

on or about April 27, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 FIFTY THREE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Quashyne Seburn

and

Bryant Hawkins

on or about April 27, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY FOUR

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

Terrance Shells

and

Abdul Bryant

on or about March 16, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Terrance Shells

and

Abdul Bryant

on or about March 16, 2016, at the City of Newark, in the County of Essex, 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 FIFTY SIX

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Terrance Shells

and

Abdul Bryant

on or about March 16, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 FIFTY SEVEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Terrance Shells

and

Abdul Bryant

on or about March 16, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY EIGHT

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

Terrance Shells

and

Tyree Oxford

on or about May 11, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY NINE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Terrance Shells

and

Tyree Oxford

on or about May 11, 2016, at the City of Newark, in the County of Essex, 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 SIXTY

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Terrance Shells

and

Tyree Oxford

on or about May 11, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 SIXTY ONE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Terrance Shells

and

Tyree Oxford

on or about May 11, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY TWO

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

Terrance Shells

and

Alquan Shells

on or about April 28, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY THREE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Terrance Shells

and

Alquan Shells

on or about April 28, 2016, at the City of Newark, in the County of Essex, 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 SIXTY FOUR

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Terrance Shells

and

Alquan Shells

on or about April 28, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 SIXTY FIVE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Terrance Shells

and

Alquan Shells

on or about April 28, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY SIX

(Terroristic Threats - Third Degree)

Terrance Shells

on or about April 28, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did threaten to kill Detective Sergeant Anthony Zoppina with purpose to put the said Detective Sergeant Anthony Zoppina in imminent fear of death under circumstances reasonably causing the said Detective Sergeant Anthony Zoppina to believe the immediacy of the threat and the likelihood that it would be carried out, contrary to the provisions of N.J.S.A. 2C:12-3b, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY SEVEN

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

Abdul Bryant

and

Tyre Sorbino

on or about March 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, fentanyl, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY EIGHT

(Distribution of a Controlled Dangerous Substance - Third Degree)

Abdul Bryant

and

Tyre Sorbino

on or about March 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY NINE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Abdul Bryant

and

Tyre Sorbino

on or about March 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 SEVENTY

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Abdul Bryant

and

Tyre Sorbino

on or about March 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY ONE

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

Abdul Bryant

and

Nyreek Loyal

on or about March 30, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY TWO

(Distribution of a Controlled Dangerous Substance - Third Degree)

Abdul Bryant

and

Nyreek Loyal

on or about March 30, 2016, at the City of Newark, in the County of Essex, 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 SEVENTY THREE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Abdul Bryant

and

Nyreek Loyal

on or about March 30, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 SEVENTY FOUR

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Abdul Bryant

and

Nyreek Loyal

on or about March 30, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY FIVE

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

Kevin Loyal

on or about March 18, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY SIX

(Distribution of a Controlled Dangerous Substance - Third Degree

Kevin Loyal

on or about March 18, 2016, at the City of Newark, in the County of Essex, 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 SEVENTY SEVEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Kevin Loyal

on or about March 18, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 SEVENTY EIGHT

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Kevin Loyal

on or about March 18, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY NINE

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

Lyonel Finklea

on or about March 23, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY

(Distribution of a Controlled Dangerous Substance - Third Degree)

Lyonel Finklea

on or about March 23, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY ONE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Lyonel Finklea

on or about March 23, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark 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 EIGHTY TWO

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Lyonel Finklea

on or about March 23, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY THREE

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

Lyonel Finklea

and

Ramon Finklea

on or about April 8, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY FOUR

(Distribution of a Controlled Dangerous Substance - Third Degree

Lyonel Finklea

and

Ramon Finklea

on or about April 8, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY FIVE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Lyonel Finklea

and

Ramon Finklea

on or about April 8, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 EIGHTY SIX

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Lyonel Finklea

and

Ramon Finklea

on or about April 8, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY SEVEN

(Promoting Organized Street Crime - First Degree)

Ramon Finklea

on or about April 8, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did conspire with others as an organizer, supervisor, financier or manager to commit the crimes of possession with intent to distribute controlled dangerous substances, in violation of N.J.S.A. 2C:35-5, and/or distribution of controlled dangerous substances, in violation of N.J.S.A. 2C:35-5, and/or distribution of controlled dangerous substances within 1,000 feet of a school, in violation of N.J.S.A. 2C:35-7, and/or distribution of controlled dangerous substances within 500 feet of a public park, in violation of N.J.S.A. 2C:35-7.1a, contrary to the provisions of N.J.S.A. 2C:33-30, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY EIGHT

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

Tyree Oxford

on or about April 19, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, fentanyl, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY NINE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Tyree Oxford

on or about April 19, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT NINETY

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Tyree Oxford

on or about April 19, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark 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 NINETY ONE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Tyree Oxford

on or about April 19, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a, and against the peace of this State, the government and dignity of the same.

COUNT NINETY TWO

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

Bryant Hawkins

and

Jahwon Christian

on or about June 15, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETY THREE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Bryant Hawkins

and

Jahwon Christian

on or about June 15, 2016, at the City of Newark, in the County of Essex, 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 NINETY FOUR

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Bryant Hawkins

and

Jahwon Christian

on or about June 15, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 NINETY FIVE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Bryant Hawkins

and

Jahwon Christian

on or about June 15, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETY SIX

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

Bryant Hawkins

and

Elijah Evans

on or about June 28, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETY SEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

Bryant Hawkins

and

Elijah Evans

on or about June 28, 2016, at the City of Newark, in the County of Essex, 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 NINETY EIGHT

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Bryant Hawkins

and

Elijah Evans

on or about June 28, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 NINETY NINE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Bryant Hawkins

and

Elijah Evans

on or about June 28, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED

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

Elijah Evans

and

Ramadan Daniels

on or about May 3, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED ONE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Elijah Evans

and

Ramadan Daniels

on or about May 3, 2016, at the City of Newark, in the County of Essex, 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 ONE HUNDRED TWO

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Elijah Evans

and

Ramadan Daniels

on or about May 3, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 ONE HUNDRED THREE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Elijah Evans

and

Ramadan Daniels

on or about May 3, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED FOUR

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

Darnell Cogman

and

Jahob Loyal

on or about May 18, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Darnell Cogman

and

Jahob Loyal

on or about May 18, 2016, at the City of Newark, in the County of Essex, 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 ONE HUNDRED SIX

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Darnell Cogman

and

Jahob Loyal

on or about May 18, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 ONE HUNDRED SEVEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Darnell Cogman

and

Jahob Loyal

on or about May 18, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED EIGHT

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

Charlie Jones

on or about June 8, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, fentanyl, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED NINE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Charlie Jones

on or about June 8, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, fentanyl, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED TEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Charlie Jones

on or about June 8, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 ONE HUNDRED ELEVEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Charlie Jones

on or about June 8, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED TWELVE

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

Tyre Sorbino

and

Nyreek Loyal

on or about March 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, fentanyl, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) N.J.S.A. 2C:35-5b(5), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED THIRTEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

Tyre Sorbino

and

Nyreek Loyal

on or about March 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, fentanyl, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED FOURTEEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Tyre Sorbino

and

Nyreek Loyal

on or about March 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 ONE HUNDRED FIFTEEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Tyre Sorbino

and

Nyreek Loyal

on or about March 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED SIXTEEN

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

Bishop Jackson

and

Terrance Shells

on or about May 11, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED SEVENTEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

Bishop Jackson

and

Terrance Shells

on or about May 11, 2016, at the City of Newark, in the County of Essex, 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 ONE HUNDRED EIGHTEEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Bishop Jackson

and

Terrance Shells

on or about May 11, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 ONE HUNDRED NINETEEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Bishop Jackson

and

Terrance Shells

on or about May 11, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED TWENTY

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

Alquan Shells

on or about March 24, 2016, at the City of Newark, in the County of Essex, 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) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED TWENTY ONE

(Distribution of a Controlled Dangerous Substance - Third Degree)

Alquan Shells

on or about March 24, 2016, at the City of Newark, in the County of Essex, 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) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED TWENTY TWO

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Alquan Shells

on or about March 24, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark 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 ONE HUNDRED TWENTY THREE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Alquan Shells

on or about March 24, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED TWENTY FOUR

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

Kevin Loyal

and

Tyree Williams

on or about March 30, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED TWENTY FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree

Kevin Loyal

and

Tyree Williams

on or about March 30, 2016, at the City of Newark, in the County of Essex, 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 ONE HUNDRED TWENTY SIX

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Kevin Loyal

and

Tyree Williams

on or about March 30, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 ONE HUNDRED TWENTY SEVEN

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Kevin Loyal

and

Tyree Williams

on or about March 30, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED TWENTY EIGHT

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

Terrance Shells

and

John Doe, known as "Sha"

on or about June 2, 2016, at the City of Newark, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED TWENTY NINE

(Distribution of a Controlled Dangerous Substance - Third Degree

Terrance Shells

and

John Doe, known as "Sha"

on or about June 2, 2016, at the City of Newark, in the County of Essex, 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 ONE HUNDRED THIRTY

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Terrance Shells

and

John Doe, known as "Sha"

on or about June 2, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark Board of Education and used for school purposes, 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 ONE HUNDRED THIRTY ONE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Terrance Shells

and

John Doe, known as "Sha"

on or about June 2, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED THIRTY TWO

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

Wali Johnson

on or about March 3, 2016, at the City of Newark, in the County of Essex, 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) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED THIRTY THREE

(Distribution of a Controlled Dangerous Substance - Third Degree

Wali Johnson

on or about March 3, 2016, at the City of Newark, in the County of Essex, 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) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED THIRTY FOUR

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 1,000 feet of School Property - Third Degree)

Wali Johnson

on or about March 3, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Miller Street Elementary School and/or the Louise A. Spencer Elementary School, which is owned by or leased to the Newark 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 ONE HUNDRED THIRTY FIVE

(Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property- Second Degree)

Wali Johnson

on or about March 3, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Jesse Allen Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED THIRTY SIX

(Gang Criminality - First Degree)

Kevin Clayton

Aljuquan Thomason

Yasim Smith

Nyreek Loyal

Jahob Loyal

Quashyne Seburn

Abdul Bryant

Kevin Loyal

Lyonel Finklea

Tyree Oxford

Bryant Hawkins

Elijah Evans

Charlie Jones

Jahwon Christian

Ramon Finklea

Yasin Hamilton

Tyree Williams

and

Alquan Shells

between on or about March 3, 2016 and on or about May 31, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while knowingly involved in criminal street gang activity, did commit, attempt to commit, or conspire to commit violations of Chapter 35 of Title 2C of the New Jersey Statutes and/or N.J.S.A. 2C:39-5 and/or N.J.S.A. 2C:39-3, contrary to the provisions of N.J.S.A. 2C:33-29, and against the peace of this State, the government and dignity of the same.

COUNT ONE HUNDRED THIRTY SEVEN

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

Kevin Clayton

on or about January 20, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Possession of a Controlled Dangerous Substance on or within 1,000 feet of School Property on Essex County Indictment 12-06-0115-I, did purchase, own, possess or control a firearm, that is, a Glock Model 33 .357 caliber semi-automatic handgun bearing serial number FPY267, 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.

A TRUE BILL:

Deputu Foreperson

Dated: 1

AAD fill S. Mayer

Deputy Director

Division of Criminal Justice