

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

FILED

FEB 06 2018

State Grand Jury Judge

State Grand Jury

Number SGJ712-18-14

Superior Court

Docket Number

18-02-00078-S

STATE OF NEW JERSEY)

v.)

CHUCKY SCOTT)

EDUARDO CABAN)

ANTHONY HAMMOND)

ERIC MOORE)

TYMERE JENNINGS)

JAMAL FOLK)

AKA "IBRAHEEM ABDULLAH")

and)

DARREN HARVILLE)

INDICTMENT

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

COUNT ONE

(Racketeering - First Degree)

CHUCKY SCOTT

EDUARDO CABAN

ANTHONY HAMMOND

ERIC MOORE

TYMERE JENNINGS

JAMAL FOLK

and

DARREN HARVILLE

and other persons whose identities are unknown to the Grand Jurors, who are named as a co-conspirators and members of the enterprise but not as defendants herein, at the times and places herein specified, did commit the crime of Racketeering, that is, the defendants and other persons employed by or associated with an enterprise engaged in or the activities of which affected trade or commerce, purposely or knowingly did conduct or participate directly or indirectly, or did conspire in the conduct of the enterprise's affairs through a pattern of racketeering activity, including the commission of a crime of the first degree, in violation of N.J.S.A. 2C:41-2c and N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES AND PLACES

The predicate criminal activity occurred between on or about April 7, 2016, and on or about July 9, 2017, at the City of Camden, in the County of Camden, in the State of Ohio, in the State of West Virginia, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

CHUCKY SCOTT, EDUARDO CABAN, ANTHONY HAMMOND, ERIC MOORE, TYMERE JENNINGS, JAMAL FOLK, DARREN HARVILLE, and other persons whose identities are unknown to the Grand Jurors, who are named as a co-conspirators and members of the enterprise but not as defendants herein, did constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise included collectively generating income on behalf of and for the benefit of members of the enterprise through trafficking weapons into this State for the unlawful sale, manufacture, transport, or disposition of firearms, using a defined structure with roles for each enterprise member or associate, dividing proceeds from enterprise members' and associates' criminal activities in accordance with enterprise protocol, and concealing from law enforcement authorities the existence of the enterprise, the means and locations from which it conducted its affairs, including but not limited to using a variety of locations, residences or motor vehicles for storage or delivery of firearms that members and associates of the enterprise bought and sold, and to conceal the profits derived from these activities.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, consisted of at least two incidents of racketeering conduct by the enterprise during the relevant time, including Leader of a Firearms Trafficking Network (N.J.S.A. 2C:39-16), Transporting Firearms Into the State for an Unlawful Sale or Transfer (N.J.S.A. 2C:39-9i), Manufacture, Transport, Disposition of a Firearm (N.J.S.A. 2C:39-9d), Manufacture, Transport, Disposition of an Assault Firearm (N.J.S.A. 2C:39-9g), and Financial Facilitation of Criminal Activity (N.J.S.A. 2C:21-25), or Conspiracies to commit these crimes, as described herein and in Counts Two, Three, Five, Seven, Eleven, Fifteen, Twenty-One, Twenty-Five, Thirty-One, Thirty-Two, Thirty-Four, and Thirty-Five of this Indictment.

CHUCKY SCOTT

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Leader of a Firearms Trafficking Network; Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; and Financial Facilitation of Criminal Activity; which racketeering conduct is the subject of Counts Two, Three, Five, Seven, Eleven, Fifteen, Twenty-One, Twenty-Five, Thirty-One, Thirty-Two, Thirty-Four, and Thirty Five of this Indictment.

EDUARDO CABAN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; and Financial Facilitation of Criminal Activity; which racketeering conduct is the subject of Counts Two, Five, Eleven, Fifteen, Twenty-One, Twenty-Five, Thirty-One, Thirty-Two, Thirty-Four, and Thirty-Five of this Indictment.

ANTHONY HAMMOND

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; and Financial Facilitation of Criminal Activity; which racketeering conduct is the subject of Counts Two, Five, Seven, Eleven, Fifteen, Twenty-One, Twenty-Five, Thirty-One, Thirty-Two, and Thirty-Five of this Indictment.

ERIC MOORE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer and Financial Facilitation of Criminal Activity; which racketeering conduct is the subject of Counts Two,

Five, and Thirty-Five of this Indictment.

TYMERE JENNINGS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer and Financial Facilitation of Criminal Activity; which racketeering conduct is the subject of Counts Two, Five, and Thirty-Five of this Indictment.

JAMAL FOLK

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer and Financial Facilitation of Criminal Activity; which racketeering conduct is the subject of Counts Two, Five, and Thirty-Five of this Indictment.

DARREN HARVILLE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer and Financial Facilitation of Criminal Activity; which racketeering conduct is the subject of Counts Two, Five, and Thirty-Five of this Indictment.

All in violation of N.J.S.A. 2C:41-2c and N.J.S.A. 2C:41-2d, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Conspiracy - Second Degree)

CHUCKY SCOTT

EDUARDO CABAN

ANTHONY HAMMOND

ERIC MOORE

TYMERE JENNINGS

JAMAL FOLK

and

DARREN HARVILLE

who are named as defendants herein, and other persons whose identities are unknown to the Grand Jurors, who are named as a co-conspirators but not as defendants herein between on or about April 7, 2016, and on or about July 9, 2017, at the City of Camden, in the County of Camden, in the State of Ohio, in the State of West Virginia, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Transporting a Firearm into this State for an Unlawful Sale or Transfer; Unlawful Possession of a Firearm; Unlawful Possession of an Assault Firearm; Unlawful Possession of a Large Capacity Ammunition Magazine; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition, of an Assault Firearm; Manufacture, Transport, Disposition of a Large Capacity Ammunition

Magazine; and Financial Facilitation of Criminal Activity; did agree together, and with a person whose identity is unknown to the Grand Jurors, who at all times relevant to this indictment was an agent of the New Jersey State Police, that:

1. One or more of them would engage in conduct which would constitute the aforesaid crime, or

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

A. Knowingly or purposely transport, ship, or otherwise bring into this State any firearm for the purpose of unlawfully selling, transferring, giving, assigning, or disposing of that firearm to another individual, contrary to the provisions of N.J.S.A. 2C:39-9i.

B. Knowingly to possess a certain weapon, that is, a firearm, 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.

C. Knowingly to possess an assault firearm, contrary to the provisions of N.J.S.A. 2C:39-5f.

D. Knowingly to possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3j.

E. Knowingly transport, ship, sell, or dispose of a firearm, contrary to N.J.S.A. 2C:39-9d.

F. Knowingly transport, ship, sell, or dispose of a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-9h.

G. Knowingly transport, ship, sell, or dispose of an assault firearm, contrary to N.J.S.A. 2C:39-9g.

H. Knowingly did transport or possess property or did engage in transactions involving property known to be, or which a reasonable person would believe to be derived from criminal activity, with a value of less than \$75,000, with the intent to facilitate or promote such activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the property derived from the said criminal activity, or the transactions in property known to be, 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.

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

COUNT THREE

(Leader of a Firearms Trafficking Network - First Degree)

CHUCKY SCOTT

between on or about April 7, 2016, and on or about July 9, 2017, at the City of Camden, in the County of Camden, in the State of Ohio, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier or manager of at least two other persons, to engage for profit in a scheme or course of conduct to unlawfully manufacture, distribute, transport, ship, sell, or dispose of any firearm, contrary to the provisions of N.J.S.A. 2C:39-16, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Promoting Organized Street Crime - First Degree)

CHUCKY SCOTT

between on or about April 7, 2016, and on or about July 9, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier or manager, to commit one or more of the crimes enumerated in N.J.S.A. 2C:33-30, specifically, Possession of a Prohibited Weapon, in violation of N.J.S.A. 2C:39-3j, Unlawful Possession of a Weapon, in violation N.J.S.A. 2C:39-5b, Unlawful Possession of an Assault Firearm, in violation of N.J.S.A. 2C:39-5f, Manufacture, Manufacture, Transport, Disposition of a Firearm, in violation of N.J.S.A. 2C:39-9d, Manufacture, Transport, Disposition, of an Assault Firearm, in violation of N.J.S.A. 2C:39-9g, Manufacture, Transport, Disposition of a Large Capacity Ammunition Magazine, in violation of N.J.S.A. 2C:39-9h, Transporting a Firearm into this State for an Unlawful Sale or Transfer, in violation N.J.S.A. 2C:39-9i, 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 FIVE

(Transporting Firearms into the State for an
Unlawful Sale or Transfer - Second Degree)

CHUCKY SCOTT

EDUARDO CABAN

ANTHONY HAMMOND

ERIC MOORE

TYMERE JENNINGS

JAMAL FOLK

and

DARREN HARVILLE

between on or about April 7, 2016, and on or about July 9, 2017, at the City of Camden, in the County of Camden, in the State of Ohio, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did transport, ship, or otherwise bring into this State any firearm for the purpose of unlawfully selling, transferring, giving, assigning, or disposing of that firearm to another individual, contrary to N.J.S.A. 2C:39-9i, 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)

CHUCKY SCOTT

and

JAMAL FOLK

on or about May 5, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Taurus Model PT-111, 9mm Luger pistol, serial number TKN22317 or a Taurus Model PT709 Slim, 9mm Luger pistol, serial number JW9527, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Unlawful Disposition of a Handgun - Fourth Degree)

CHUCKY SCOTT

and

ANTHONY HAMMOND

on or about May 5, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a Taurus Model PT-111, 9mm Luger pistol, serial number TKN22317 or a Taurus Model PT709 Slim, 9mm Luger pistol, serial number JW9527, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Unlawful Possession of a Weapon - Second Degree)

CHUCKY SCOTT

and

EDUARDO CABAN

on or about June 3, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Taurus 9mm Luger pistol, serial number TKN29865, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Unlawful Possession of a Weapon - Second Degree)

CHUCKY SCOTT

and

EDUARDO CABAN

on or about June 3, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Taurus 9mm Luger pistol, serial number TK031793, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

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

CHUCKY SCOTT

and

EDUARDO CABAN

on or about June 3, 2017, at the City of Camden, in the County of Camden, 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, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Unlawful Disposition of a Handgun - Fourth Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about June 3, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a Taurus 9mm Luger pistol, serial number TKN29865, and/or a Taurus 9mm Luger pistol, serial number TK031793, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Manufacture, Transport, Disposition of a
Large Capacity Ammunition Magazine - Fourth Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about June 3, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-9h, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Unlawful Possession of a Weapon - Second Degree)

CHUCKY SCOTT

and

EDUARDO CABAN

on or about June 9, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Smith & Wesson 9mm Luger pistol, serial number HRV9188, 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 FOURTEEN

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

CHUCKY SCOTT

and

EDUARDO CABAN

on or about June 9, 2017, at the City of Camden, in the County of Camden, 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, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Unlawful Disposition of a Handgun - Fourth Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about June 9, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a Smith & Wesson 9mm Luger pistol, serial number HRV9188, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Manufacture, Transport, Disposition of a
Large Capacity Ammunition Magazine - Fourth Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about June 9, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-9h, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Unlawful Possession of a Weapon - Second Degree)

CHUCKY SCOTT

and

ANTHONY HAMMOND

on or about June 23, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Taurus 9mm Luger pistol, serial number TK091058, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Unlawful Possession of a Weapon - Second Degree)

CHUCKY SCOTT

and

ANTHONY HAMMOND

on or about June 23, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Taurus 9mm Luger pistol, serial number TKN24990, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Unlawful Possession of a Weapon - Second Degree)

CHUCKY SCOTT

and

ANTHONY HAMMOND

on or about June 23, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Springfield Armory 9mm Luger pistol, serial number US8232459, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

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

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about June 23, 2017, at the City of Camden, in the County of Camden, 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, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Unlawful Disposition of a Handgun - Fourth Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about June 23, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a Taurus 9mm Luger pistol, serial number TK091058, and/or a Taurus 9mm Luger pistol, serial number TKN24990, and/or a Springfield Armory 9mm Luger pistol, serial number US8232459, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Manufacture, Transport, Disposition of a
Large Capacity Ammunition Magazine - Fourth Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about June 23, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-9h, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Unlawful Possession of an Assault Firearm - Second Degree)

CHUCKY SCOTT

and

EDUARDO CABAN

on or about July 1, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession an assault firearm, that is, a Zastava 7.62 x 39mm caliber assault rifle, serial number M92PV056869, contrary to the provisions of N.J.S.A. 2C:39-5f, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

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

CHUCKY SCOTT

and

EDUARDO CABAN

on or about July 1, 2017, at the City of Camden, in the County of Camden, 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, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Manufacture, Transport, Disposition of an
Assault Firearm - Third Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about July 1, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of an assault firearm, that is, a Zastava 7.62 x 39mm caliber assault rifle, serial number M92PV056869, without having been licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Manufacture, Transport, Disposition of a
Large Capacity Ammunition Magazine - Fourth Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about July 1, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-9h, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Unlawful Possession of an Assault Firearm - Second Degree)

CHUCKY SCOTT

and

EDUARDO CABAN

on or about July 7, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession an assault firearm, that is, an Anderson Manufacturing .223 caliber AR-15 assault rifle, serial number 15221270, contrary to the provisions of N.J.S.A. 2C:39-5f, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Unlawful Possession of a Weapon - Second Degree)

CHUCKY SCOTT

on or about July 7, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Remington .45 caliber pistol, serial number RH41369A, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Unlawful Possession of a Weapon - Second Degree)

CHUCKY SCOTT

on or about July 7, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Smith & Wesson .40 caliber pistol, serial number DXY3928, 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 THIRTY

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

CHUCKY SCOTT

and

EDUARDO CABAN

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

COUNT THIRTY-ONE

(Manufacture, Transport, Disposition of an
Assault Firearm - Third Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about July 7, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of an assault firearm, that is, an Anderson Manufacturing .223 caliber AR-15 assault rifle, serial number 15221270, without having been licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Manufacture, Transport, Disposition of a
Firearm - Fourth Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about July 7, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a Remington .45 caliber pistol, serial number RH41369A, and/or a Smith & Wesson .40 caliber pistol, serial number DXY3928, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Manufacture, Transport, Disposition of a
Large Capacity Ammunition Magazine - Fourth Degree)

CHUCKY SCOTT

ANTHONY HAMMOND

and

EDUARDO CABAN

on or about July 7, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-9h, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Financial Facilitation of Criminal Activity - Third Degree)

CHUCKY SCOTT

and

EDUARDO CABAN

between on or about July 7, 2017, and on or about July 9, 2017, at the City of Camden, in the County of Camden, in the State of West Virginia, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property, that is \$6,000, or did engage in transactions involving property known to be, or which a reasonable person would believe to be derived from criminal activity, with a value of less than \$75,000, with the intent to facilitate or promote such activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the property derived from the said criminal activity, or the transactions in property known to be, or which a reasonable person would believe to be, derived from criminal activity, that is, CHUCKY SCOTT and EDUARDO CABAN, did transport or possess U.S. currency, knowing, or having reason to believe, the property that was transported or possessed was derived from criminal activity, that the transactions involving said property were designed in whole or in part with the intent to facilitate or promote the criminal activity, or to conceal or disguise the nature,

location, source, ownership, or control of the said property derived through criminal activity, or transactions in said property was of property 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, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Financial Facilitation of Criminal Activity - Third Degree)

CHUCKY SCOTT

EDUARDO CABAN

ANTHONY HAMMOND

ERIC MOORE

TYMERE JENNINGS

JAMAL FOLK

and

DARREN HARVILLE

between on or about April 7, 2016, and on or about July 9, 2017, at the City of Camden, in the County of Camden, in the State of Ohio, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property or did engage in transactions involving property known to be, or which a reasonable person would believe to be derived from criminal activity, with a value of less than \$75,000, with the intent to facilitate or promote such activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the property derived from the said criminal activity, or the transactions in property known to be, or which a reasonable person would believe to be, derived from criminal activity, that is, CHUCKY SCOTT, EDUARDO CABAN, ANTHONY HAMMOND, ERIC MOORE, TYMERE JENNINGS,

JAMAL FOLK, and DARREN HARVILLE did transport or possess U.S. currency, knowing, or having reason to believe, the property that was transported or possessed was derived from criminal activity, that the transactions involving said property were designed in whole or in part with the intent to facilitate or promote the criminal activity, or to conceal or disguise the nature, location, source, ownership, or control of the said property derived through criminal activity, or transactions in said property was of property 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, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Certain Persons Not to Have Weapons - Second Degree)

JAMAL FOLK

on or about May 5, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crimes of Third Degree Distribution/Possession with Intent to Distribute a Controlled Dangerous Substance in Camden County, on indictment number CAM031003941I, and/or Third Degree Distribution/Possession with Intent to Distribute a Controlled Dangerous Substance within 1,000 feet of School Property in Atlantic County, on indictment ATL090100143I, did purchase, own, possess or control the following firearm: a Taurus Model PT-111, 9mm Luger pistol, serial number TKN22317 or a Taurus Model PT709 Slim, 9mm Luger pistol, serial number JW9527, contrary to the provisions of N.J.S.A. 2C:39-7, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SEVEN

(Certain Persons Not to Have Weapons - Second Degree)

EDUARDO CABAN

between on or about June 3, 2017, and on or about July 7, 2017, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crimes of Third Degree Distribution/Possession with Intent to Distribute a Controlled Dangerous Substance within 1,000 feet of School Property in Camden County, on indictment CAM970501548I, and/or Second Degree Distribution of a Controlled Dangerous Substance in Federal Court, did purchase, own, possess or control the following firearms: a Taurus 9mm Luger pistol, serial number TKN29865, and/or a Taurus 9mm Luger pistol, serial number TK031793, and/or a Smith & Wesson 9mm Luger pistol, serial number HRV9188, and/or a Taurus 9mm Luger pistol, serial number TK091058, and/or a Taurus 9mm Luger pistol, serial number TKN24990, and/or a Springfield Armory 9mm Luger pistol, serial number US8232459, and/or a Zastava 7.62 x 39mm caliber assault rifle, serial number M92PV056869, and/or an Anderson Manufacturing .223 caliber AR-15 assault rifle, serial number 15221270, and/or a Remington .45 caliber pistol, serial number RH41369A, and/or a Smith & Wesson .40 caliber pistol, serial number DXY3928, contrary to the

provisions of N.J.S.A. 2C:39-7, and against the peace of this State,
the government and dignity of the same.

AAG ELIE HONIG
DIRECTOR
DIVISION OF CRIMINAL JUSTICE



BY: AAG JILL S. MAYER
Deputy Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

2/6/19

DATED

FILED

FEB 06 2018

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ712-18-14

Superior Court

Docket Number

18-02-00018-5

STATE OF NEW JERSEY)

v.)

CHUCKY SCOTT)

EDUARDO CABAN)

ANTHONY HAMMOND)

ERIC MOORE)

TYMERE JENNINGS)

JAMAL FOLK)

aka)

"IBRAHEEM ABDULLAH")

and)

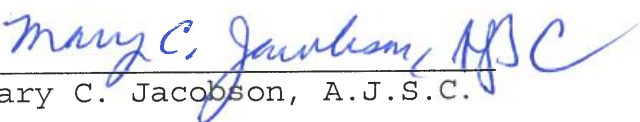
DARREN HARVILLE)

ORDER OF VENUE

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

IT IS ORDERED on this *6th* day of *February*, 2018, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Camden be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Camden for filing.


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