

FILED

JUL 23 2018

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ721-18-4

Superior Court

Docket Number 18-07-00124-S

STATE OF NEW JERSEY)
)
 v.)
MYLOVE D. TETTERTON)
)
CONSTANTINE KUNAKA)
)
ANTHONY HODGES)
)
JEAN ALLEN)
)
VALERIE ANDERSON)
)
KAREN BRISTOL-THOMAS)
)
MAX CLAIRSIN)
)
JAMAL COAR)
)
JASMIRE COAR)
)
GABRIEL DARAVINA)
)
CHANTE DARBY)
)
YVETTE FOUNTAIN)
)
KEVIN GRANT)
)
REGINALD HAINES)
)
DESTRY HARRIS)
)
ROSETTA HODGES)

INDICTMENT

JOSEPH PIERCE)
YOLANDA TERRY)
MYLOVE A. TETTERTON)
KASEEM STEPHENS)
KHYREQ TETTERTON)
JERMAINE THOMAS)
WILLIAM YOUNG)
and)
D'JENNE ZULU)

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

COUNT ONE

(Promoting Organized Street Crime - First Degree)

MYLOVE D. TETTERTON

between on or about May 18, 2013 and on or about January 24, 2014, in the City of Jersey City, in the City of Bayonne, both in the County of Hudson, in the City of East Orange, in the City of Newark, both in the County of Essex, in the Township of Neptune, in the County of Monmouth, in the City of Atlantic City, in the County of Atlantic, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly conspired with others as an organizer, supervisor, financier or manager to commit the crimes of Theft by Deception,

in violation of N.J.S.A. 2C:20-4, or Receiving Stolen Property,
in violation of N.J.S.A. 2C:20-7, contrary to the provisions of
N.J.S.A. 2C:33-30 and N.J.S.A. 2C:2-6, and against the peace of
this State, the government and dignity of the same.

COUNT TWO

(Trafficking in Personal Identifying Information - Second Degree)

MYLOVE D. TETTERTON

and

ANTHONY HODGES

on or about August 10, 2015, in the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did distribute, manufacture, or possess 10 or more items containing personal identifying information pertaining to five or more separate persons, without authorization, and with the purpose of facilitating a fraud or injury, that is, MYLOVE D. TETTERTON and ANTHONY HODGES did possess a list of over 400 individuals' personal identifying information, contrary to the provisions of N.J.S.A. 2C:21-17.3b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Financial Facilitation of Criminal Activity - Second Degree)

MYLOVE D. TETTERTON

between on or about May 18, 2013 and on or about January 24, 2014, in the City of Jersey City, in the City of Bayonne, both in the County of Hudson, in the City of East Orange, in the City of Newark, both in the County of Essex, in the Township of Neptune, in the County of Monmouth, in the City of Atlantic City, in the County of Atlantic, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did direct, organize, finance, plan, manage, supervise, or control the transportation of or transactions in property known or which a reasonable person would believe to be derived from criminal activity; that is, MYLOVE D. TETTERTON, did direct, organize, finance, plan, manage, supervise, or control the transportation of or transactions involving approximately \$246,667 in State of Hawaii tax refund checks, which MYLOVE D. TETTERTON knew, or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(CONSPIRACY - SECOND DEGREE)

MYLOVE D. TETTERTON

CONSTANTINE KUNAKA

ANTHONY HODGES

JEAN ALLEN

VALERIE ANDERSON

KAREN BRISTOL-THOMAS

MAX CLAIRSIN

JAMAL COAR

JASMIRE COAR

GABRIEL DARAVINA

CHANTE DARBY

YVETTE FOUNTAIN

KEVIN GRANT

REGINALD HAINES

DESTRY HARRIS

ROSETTA HODGES

JOSEPH PIERCE

YOLANDA TERRY

MYLOVE A. TETTERTON

KASEEM STEPHENS

KHYREQ TETTERTON

JERMAINE THOMAS

WILLIAM YOUNG

and

D'JENNE ZULU

between on or about May 18, 2013 and on or about January 24, 2014, in the City of Jersey City, in the City of Bayonne, both in the County of Hudson, in the City of East Orange, in the City of Newark, both in the County of Essex, in the Township of Neptune, in the County of Monmouth, in the City of Atlantic City, in the County of Atlantic, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Trafficking in Personal Identifying Information Pertaining to Another Person, Theft by Deception, Receiving Stolen Property, Financial Facilitation of Criminal Activity, or Forgery, did agree that:

- A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or
- B. One of more of them knowingly would aid in the planning, solicitation or commission of said crimes, that is:

- 1. knowingly did distribute, manufacture, or possess 10 or more items containing personal identifying information pertaining to five or more separate persons, without authorization, and with the

purpose of facilitating a fraud or injury,
contrary to the provisions of N.J.S.A. 2C:21-
17.3b(2);

2. purposely did obtain, or did attempt to obtain, by deception, property of another, having a value of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:20-4;
3. did commit theft by knowingly receiving or bringing into this State movable property of another, having a value of \$75,000 or more, knowing the same to be stolen or believing that it had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7;
4. did transport or possess property known or which a reasonable person would believe to be derived from criminal activity with a value of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25a;
5. did engage in a transaction involving property, in the amount of \$75,000 or more, known or which a reasonable person would believe to be derived from criminal activity, with the intent to facilitate or promote the criminal 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 criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(1) and N.J.S.A. 2C:21-25b(2); or

6. with purpose to defraud or injure or knowingly facilitating a fraud or injury perpetrated by another, did utter a writing, knowing the same to be altered or changed without authorization, contrary to the provisions of N.J.S.A. 2C:21-1a(3).

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 FIVE

(Trafficking in Personal Identifying Information - Second Degree)

MYLOVE D. TETTERTON

CONSTANTINE KUNAKA

ANTHONY HODGES

JEAN ALLEN

VALERIE ANDERSON

KAREN BRISTOL-THOMAS

MAX CLAIRSIN

JAMAL COAR

JASMIRE COAR

GABRIEL DARAVINA

CHANTE DARBY

YVETTE FOUNTAIN

KEVIN GRANT

REGINALD HAINES

DESTRY HARRIS

ROSETTA HODGES

JOSEPH PIERCE

YOLANDA TERRY

MYLOVE A. TETTERTON

KASEEM STEPHENS

KHYREQ TETTERTON

JERMAINE THOMAS

WILLIAM YOUNG

and

D'JENNE ZULU

between on or about May 18, 2013 and on or about January 24, 2014, in the City of Jersey City, in the City of Bayonne, both in the County of Hudson, in the City of East Orange, in the City of Newark, both in the County of Essex, in the Township of Neptune, in the County of Monmouth, in the City of Atlantic City, in the County of Atlantic, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did distribute, manufacture, or possess 10 or more items containing personal identifying information pertaining to five or more separate persons, without authorization, and with the purpose of facilitating a fraud or injury, by using that personal identifying information to file fraudulent State of Hawaii tax returns, contrary to the provisions of N.J.S.A. 2C:21-17.3b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft by Deception - Second Degree)

MYLOVE D. TETTERTON

CONSTANTINE KUNAKA

ANTHONY HODGES

JEAN ALLEN

VALERIE ANDERSON

KAREN BRISTOL-THOMAS

MAX CLAIRSIN

JAMAL COAR

JASMIRE COAR

GABRIEL DARAVINA

CHANTE DARBY

YVETTE FOUNTAIN

KEVIN GRANT

REGINALD HAINES

DESTRY HARRIS

ROSETTA HODGES

JOSEPH PIERCE

YOLANDA TERRY

MYLOVE A. TETTERTON

KASEEM STEPHENS

KHYREQ TETTERTON

JERMAINE THOMAS

WILLIAM YOUNG

and

D'JENNE ZULU

between on or about May 18, 2013 and on or about January 24, 2014, in the City of Jersey City, in the County of Hudson, in the City of East Orange, in the City of Newark, both in the County of Essex, in the Township of Neptune, in the County of Monmouth, in the City of Atlantic City, in the County of Atlantic, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did obtain, or did attempt to obtain, from the State of Hawaii, Division of Taxation, tax refund checks in the amount of approximately \$412,882, by deception, that is, by creating or reinforcing the false impression that the individuals filing the tax returns were residents of Hawaii or worked in Hawaii during that tax year and were owed a tax refund in the amount requested, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Receiving Stolen Property - Second Degree)

MYLOVE D. TETTERTON

CONSTANTINE KUNAKA

ANTHONY HODGES

JEAN ALLEN

VALERIE ANDERSON

KAREN BRISTOL-THOMAS

MAX CLAIRSIN

JAMAL COAR

JASMIRE COAR

GABRIEL DARAVINA

CHANTE DARBY

YVETTE FOUNTAIN

KEVIN GRANT

REGINALD HAINES

DESTRY HARRIS

ROSETTA HODGES

JOSEPH PIERCE

YOLANDA TERRY

MYLOVE A. TETTERTON

KASEEM STEPHENS

KHYREQ TETTERTON

JERMAINE THOMAS

WILLIAM YOUNG

and

D'JENNE ZULU

between on or about May 18, 2013 and on or about January 24, 2014, in the City of Jersey City, in the City of Bayonne, both in the County of Hudson, in the City of East Orange, in the City of Newark, both in the County of Essex, in the Township of Neptune, in the County of Monmouth, in the City of Atlantic City, in the County of Atlantic, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit theft by knowingly receiving or bringing into this State movable property of the State of Hawaii, that is, \$246,667 in tax refund checks, knowing the same to be stolen or believing that it had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Financial Facilitation of Criminal Activity - Second Degree)

MYLOVE D. TETTERTON

CONSTANTINE KUNAKA

ANTHONY HODGES

JEAN ALLEN

VALERIE ANDERSON

KAREN BRISTOL-THOMAS

MAX CLAIRSIN

JAMAL COAR

JASMIRE COAR

GABRIEL DARAVINA

CHANTE DARBY

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KEVIN GRANT

REGINALD HAINES

DESTRY HARRIS

ROSETTA HODGES

JOSEPH PIERCE

YOLANDA TERRY

MYLOVE A. TETTERTON

KASEEM STEPHENS

KHYREQ TETTERTON

JERMAINE THOMAS

WILLIAM YOUNG

and

D'JENNE ZULU

between on or about May 18, 2013 and on or about January 24, 2014, in the City of Jersey City, in the City of Bayonne, both in the County of Hudson, in the City of East Orange, in the City of Newark, both in the County of Essex, in the Township of Neptune, in the County of Monmouth, in the City of Atlantic City, in the County of Atlantic, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did transport or possess property known or which a reasonable person would believe to be derived from criminal activity with a value of \$75,000 or more; that is, MYLOVE D. TETTERTON, CONSTANTINE KUNAKA, ANTHONY HODGES, JEAN ALLEN, VALERIE ANDERSON, KAREN BRISTOL-THOMAS, MAX CLAIRSIN, JAMAL COAR, JASMIRE COAR, GABRIEL DARAVINA, CHANTE DARBY, YVETTE FOUNTAIN, KEVIN GRANT, REGINALD HAINES, DESTRY HARRIS, ROSETTA HODGES, JOSEPH PIERCE, YOLANDA TERRY, MYLOVE A. TETTERTON, KASEEM STEPHENS, KHYREQ TETTERTON, JERMAINE THOMAS, WILLIAM YOUNG and D'JENNE ZULU, did transport or possess fraudulently obtained State of Hawaii tax refund checks totaling approximately \$246,667, which a reasonable person would believe to be derived from theft, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Financial Facilitation of Criminal Activity - Second Degree)

MYLOVE D. TETTERTON

CONSTANTINE KUNAKA

ANTHONY HODGES

JEAN ALLEN

VALERIE ANDERSON

KAREN BRISTOL-THOMAS

MAX CLAIRSIN

JAMAL COAR

JASMIRE COAR

GABRIEL DARAVINA

CHANTE DARBY

YVETTE FOUNTAIN

KEVIN GRANT

REGINALD HAINES

DESTRY HARRIS

ROSETTA HODGES

JOSEPH PIERCE

YOLANDA TERRY

MYLOVE A. TETTERTON

KASEEM STEPHENS

KHYREQ TETTERTON

JERMAINE THOMAS

WILLIAM YOUNG

and

D'JENNE ZULU

between on or about May 18, 2013 and on or about January 24, 2014, in the City of Jersey City, in the City of Bayonne, both in the County of Hudson, in the City of East Orange, in the City of Newark, both in the County of Essex, in the Township of Neptune, in the County of Monmouth, in the City of Atlantic City, in the County of Atlantic, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did engage in transactions involving property known to be derived from criminal activity, with the intent to facilitate or promote criminal 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 criminal activity; that is, MYLOVE D. TETTERTON, CONSTANTINE KUNAKA, ANTHONY HODGES, JEAN ALLEN, VALERIE ANDERSON, KAREN BRISTOL-THOMAS, MAX CLAIRSIN, JAMAL COAR, JASMIRE COAR, GABRIEL DARAVINA, CHANTE DARBY, YVETTE FOUNTAIN, KEVIN GRANT, REGINALD HAINES, DESTRY HARRIS, ROSETTA HODGES, JOSEPH PIERCE, YOLANDA TERRY, MYLOVE A. TETTERTON, KASEEM STEPHENS, KHYREQ TETTERTON, JERMAINE THOMAS, WILLIAM YOUNG and D'JENNE ZULU, did engage in transactions with fraudulently obtained State of Hawaii tax refund checks totaling approximately \$246,667 to obtain stolen

proceeds with the intent to facilitate or promote the fraudulent tax refund scheme or to conceal or disguise the nature, location, source, ownership or control of the fraudulently obtained tax refund checks, contrary to the provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Forgery - Third Degree)

MYLOVE D. TETTERTON

CONSTANTINE KUNAKA

ANTHONY HODGES

JEAN ALLEN

VALERIE ANDERSON

KAREN BRISTOL-THOMAS

MAX CLAIRSIN

JAMAL COAR

JASMIRE COAR

GABRIEL DARAVINA

CHANTE DARBY

YVETTE FOUNTAIN

KEVIN GRANT

REGINALD HAINES

DESTRY HARRIS

ROSETTA HODGES

JOSEPH PIERCE

YOLANDA TERRY

MYLOVE A. TETTERTON

KASEEM STEPHENS

KHYREQ TETTERTON

JERMAINE THOMAS

WILLIAM YOUNG

and

D'JENNE ZULU

between on or about January 7, 2014 and on or about January 24, 2014, in the City of Jersey City, in the City of Bayonne, both in the County of Hudson, in the City of East Orange, in the City of Newark, both in the County of Essex, in the Township of Monmouth, in the County of Ocean, in the City of Atlantic City, in the County of Atlantic, in the City of Trenton, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure or knowingly facilitating a fraud or injury perpetrated by another, did utter to one or more banks, a writing, that is State of Hawaii check numbers 331372, 339149, and 3405554, knowing the same to be altered without authorization, contrary to the provisions of N.J.S.A. 2C:21-1a(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

(False Government Documents - Third Degree)

MYLOVE D. TETTERTON

and

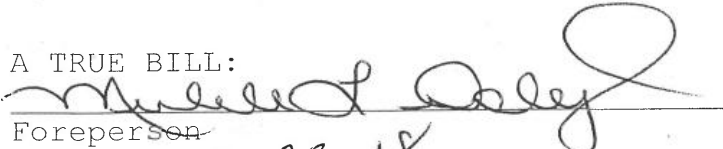
ROSETTA HODGES

on or about November 25, 2013, in the Township of Neptune, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did display or utter a document or writing which falsely purported to be a driver's license or other document issued by a governmental agency which could be used as a means of verifying a person's identity or age or any other personal identifying information, that is MYLOVE D. TETTERTON did display or utter a fraudulent State of Hawaii Driver's License to Bank of America in order to deposit fraudulently obtained State of Hawaii tax refund check number 327354, contrary to the provisions of N.J.S.A. 2C:21-2.1c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Veronica Allende
Director
Division of Criminal Justice

A TRUE BILL:


Foreperson

Dated: 7-23-18

FILED

JUL 23 2018

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ721-18-4

Superior Court

Docket Number 18-07-00124-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

MYLOVE D. TETTERTON)

CONSTANTINE KUNAKA)

ANTHONY HODGES)

JEAN ALLEN)

VALERIE ANDERSON)

KAREN BRISTOL-THOMAS)

MAX CLAIRSIN)

JAMAL COAR)

JASMIRE COAR)

GABRIEL DARAVINA)

CHANTE DARBY)

YVETTE FOUNTAIN)

KEVIN GRANT)

REGINALD HAINES)

DESTRY HARRIS)

ROSETTA HODGES)

JOSEPH PIERCE)

YOLANDA TERRY)

MYLOVE A. TETTERTON)

KASEEM STEPHENS)

KHYREQ TETTERTON)


JERMAINE THOMAS)

WILLIAM YOUNG)
and)
D' JENNE ZULU)

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

IT IS ORDERED on this 23rd day of July, 2018, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Hudson 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 Hudson for filing.



Peter E. Warshaw, P.J.S.C.