

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION (CRIMINAL)  
MONMOUTH COUNTY

THE STATE OF NEW JERSEY :  
 :  
 Plaintiff, :  
 :  
 v. : Indictment No. 10-04-00705  
 : Case No. 09-05357  
 :  
 DECTRIC RAWLS, :  
 BRANDON VASHEY, :  
 JOSEPH DUBE, :  
 JOSEPH PLAIA, :  
 JESSICA HENDERSON, :  
 JACQUELIN WIEDEMEYER, :  
 JOHN PUGLISI, :  
 KEVIN CRAVEN, :  
 JOEL BENITEZ, :  
 ROBERT CRAVEN, :  
 ARMANDO PAZO, :  
 DARYEL RAWLS, :  
 CHRISTOPHER CONNALLON, :  
 DAWN PASTOR, :  
 PETER SLOVER, :  
 RUSSELL DUNN, :  
 CHRISTINE JENKINS, :  
 JOHN MAYNARD, :  
 SHARA COPPOLA, :  
 ANTHONY GALLUCCIO, :  
 ANDREA RAY, :  
 ROBIN RUFF and :  
 DARREN BAUM :  
 :  
 Defendants. :

FIRST COUNT

CONSPIRACY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DECTRIC RAWLS, BRANDON VASHEY, JOSEPH DUBE, JOSEPH PLAIA, JESSICA HENDERSON, JACQUELIN WIEDEMEYER, JOHN PUGLISI, KEVIN CRAVEN, JOEL BENITEZ, ROBERT CRAVEN, ARMANDO PAZO, DARYEL RAWLS and CHRISTOPHER CONNALLON, on or about diverse dates between February 1, 2009 through November 16, 2009, in or about the Township of Old Bridge,

County of Middlesex, and/or the Township of Lakewood, County of Ocean, and/or the Borough of Matawan and/or the Borough of Keansburg and/or the Township of Hazlet and/or the Township of Middletown and/or the Borough of Union Beach and/or the Township of Marlboro and/or the City of Asbury Park and/or the Township of Neptune and/or the Borough of Freehold and/or the Borough of Eatontown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Conspiracy, by unlawfully agreeing with each other that they, or any one or more of them, would commit the crime of Distribution of a Controlled Dangerous Substance, to wit: heroin, in a quantity of one half ounce or more including any adulterants or dilutants, with intent to distribute, with the purpose of promoting or facilitating the commission of said crime, contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:35-5b(2), and against the peace of this State, the Government, and dignity of the same.

SECOND COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DECTRIC RAWLS, BRANDON VASHEY, JOSEPH DUBE, JOSEPH PLAIA, JESSICA HENDERSON, JACQUELIN WIEDEMEYER, JOHN PUGLISI, KEVIN CRAVEN, JOEL BENITEZ, ROBERT CRAVEN, ARMANDO PAZO, DARYEL RAWLS and CHRISTOPHER CONNALLON, on or about diverse dates between February 1, 2009 through November 16, 2009, in or about the Township of Old Bridge, County of Middlesex, and/or the Township of Lakewood, County of

Ocean, and/or the Borough of Matawan and/or the Borough of Keansburg and/or the Township of Hazlet and/or the Township of Middletown and/or the Borough of Union Beach and/or the Township of Marlboro and/or the City of Asbury Park and/or the Township of Neptune and/or the Borough of Freehold and/or the Borough of Eatontown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under their control, a controlled dangerous substance, to wit: heroin, in a quantity of one half ounce or more including any adulterants or dilutants, with intent to distribute, contrary to the provisions of 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.

THIRD COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DECTRIC RAWLS, BRANDON VASHEY, JOSEPH DUBE, JOSEPH PLAIA, JESSICA HENDERSON, JACQUELIN WIEDEMEYER, JOHN PUGLISI, KEVIN CRAVEN, JOEL BENITEZ, ROBERT CRAVEN, ARMANDO PAZO, DARYEL RAWLS and CHRISTOPHER CONNALLON, on or about diverse dates between February 1, 2009 through November 16, 2009, in or about the Township of Old Bridge, County of Middlesex, and/or the Township of Lakewood, County of Ocean, and/or the Borough of Matawan and/or the Borough of Keansburg and/or the Township of Hazlet and/or the Township of Middletown and/or the Borough of Union Beach and/or the Township

of Marlboro and/or the City of Asbury Park and/or the Township of Neptune and/or the Borough of Freehold and/or the Borough of Eatontown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, in an quantity of one half ounce or more including any adulterants or dilutants, to undercover detectives from the Monmouth County Prosecutor's Office and/or other persons both known and unknown to the Grand Jurors, contrary to the provisions of 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.

FOURTH COUNT

CONSPIRACY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DAWN PASTOR, PETER SLOVER, RUSSELL DUNN, CHRISTINE JENKINS, JOHN MAYNARD, SHARA COPPOLA, ANTHONY GALLUCCIO, ANDREA RAY, ROBIN RUFF, DARREN BAUM, who are named as defendants in this count, and Detric Rawls, Brandon Vashey, Joseph Dube, Joseph Plaia, Jessica Henderson, Jacquelin Wiedemeyer, John Puglisi, Kevin Craven, Joel Benitez, Robert Craven, Armando Pazo, Daryel Rawls, Christopher Connallon and other persons unknown to the Grand Jurors, who are named as co-conspirators but not as defendants in this count, on or about diverse dates between February 1, 2009 through November 16, 2009, in or about the Township of Old Bridge, County of Middlesex, and/or the Township of Lakewood, County of Ocean,

and/or the Borough of Matawan and/or the Borough of Keansburg and/or the Township of Hazlet and/or the Township of Middletown and/or the Borough of Union Beach and/or the Township of Marlboro and/or the City of Asbury Park and/or the Township of Neptune and/or the Borough of Freehold and/or the Borough of Eatontown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Conspiracy, by unlawfully agreeing with each other that they, or any one or more of them, would commit the crime of Possession of a Controlled Dangerous Substance, to wit: heroin, with the purpose of promoting or facilitating the commission of said crime and that in pursuance of such conspiracy and to effect the object thereof, the following overt acts were done:

OVERT ACTS

1. DAWN PASTOR, PETER SLOVER, RUSSELL DUNN, CHRISTINE JENKINS, JOHN MAYNARD, SHARA COPPOLA, ANTHONY GALLUCCIO, ANDREA RAY, ROBIN RUFF, DARREN BAUM, Detric Rawls, Brandon Vashey, Joseph Dube, Joseph Plaia, Jessica Henderson, Jacquelin Wiedemeyer, John Puglisi, Kevin Craven, Joel Benitez, Robert Craven, Armando Pazo, Daryel Rawls, Christopher Connallon and other persons unknown to the Grand Jurors, on or about diverse dates between February 1, 2009 through November 16, 2009, in or about the Township of Old Bridge, County of Middlesex, and/or the Township of Lakewood, County of Ocean, and/or the Borough of Matawan and/or the Borough of Keansburg and/or the Township of Hazlet and/or the Township of Middletown and/or the Borough of Union Beach and/or the Township of Marlboro and/or the City of Asbury Park and/or the Township of Neptune and/or the Borough of Freehold and/or the Borough of

Eatontown, County of Monmouth, did possess a controlled dangerous substances, to wit: heroin; contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

FIFTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DECTRIC RAWLS, BRANDON VASHEY, JOSEPH DUBE, JOSEPH PLAIA, JESSICA HENDERSON, JACQUELIN WIEDEMEYER, JOHN PUGLISI, KEVIN CRAVEN, JOEL BENITEZ, ROBERT CRAVEN, ARMANDO PAZO, DARYEL RAWLS and CHRISTOPHER CONNALLON, DAWN PASTOR, PETER SLOVER, RUSSELL DUNN, CHRISTINE JENKINS, JOHN MAYNARD, SHARA COPPOLA, ANTHONY GALLUCCIO, ANDREA RAY, ROBIN RUFF and DARREN BAUM, on or about diverse dates between February 1, 2009 through November 16, 2009, in or about the Township of Old Bridge, County of Middlesex, and/or the Township of Lakewood, County of Ocean, and/or the Borough of Matawan and/or the Borough of Keansburg and/or the Township of Hazlet and/or the Township of Middletown and/or the Borough of Union Beach and/or the Township of Marlboro and/or the City of Asbury Park and/or the Township of Neptune and/or the Borough of Freehold and/or the Borough of Eatontown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin,

contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the Government, and dignity of the same.

SIXTH COUNT

LEADER OF A NARCOTICS TRAFFICKING NETWORK

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DECTRIC RAWLS, on or about diverse dates between February 1, 2009 through November 16, 2009, in or about the Township of Old Bridge, County of Middlesex, and/or the Township of Lakewood, County of Ocean, and/or the Borough of Matawan and/or the Borough of Keansburg and/or the Township of Hazlet and/or the Township of Middletown and/or the Borough of Union Beach and/or the Township of Marlboro and/or the City of Asbury Park and/or the Township of Neptune and/or the Borough of Freehold and/or the Borough of Eatontown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Leader of a Narcotics Trafficking Network, by knowingly conspiring with two or more persons to engage in a scheme or course of conduct to unlawfully manufacture, distribute, dispense, bring into, or transport in this State, heroin, as an organizer, supervisor, or manager of at least one other person, while occupying a high level position in said conspiracy, contrary to the provisions of N.J.S.A. 2C:35-3, and against the peace of this State, the Government, and dignity of the same.

SEVENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ROBERT CRAVEN and ARMANDO PAZO, on or about February 18, 2009, in or about the Borough of Keansburg and/or the Township of Hazlet, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the Government, and dignity of the same.

EIGHTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ROBERT CRAVEN and ARMANDO PAZO, on or about February 18, 2009, in or about the Borough of Keansburg and/or the Township of Hazlet, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under their control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions

of 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.

NINTH COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ROBERT CRAVEN and ARMANDO PAZO, on or about February 18, 2009, in or about the Borough of Keansburg and/or the Township of Hazlet, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, contrary to the provisions of 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.

TENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ROBERT CRAVEN and ARMANDO PAZO, on or about February 23, 2009, in or about the Borough of Keansburg and/or the Township of Hazlet, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin,

contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the Government, and dignity of the same.

ELEVENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ROBERT CRAVEN and ARMANDO PAZO, on or about February 23, 2009, in or about the Borough of Keansburg and/or the Township of Hazlet, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under their control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions of 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.

TWELFTH COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ROBERT CRAVEN and ARMANDO PAZO, on or about February 23, 2009, in or about the Borough of Keansburg and/or the Township of Hazlet, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance, by

knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, contrary to the provisions of 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.

THIRTEENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ROBERT CRAVEN and ARMANDO PAZO, on or about March 19, 2009, in or about the Borough of Keansburg and/or the Township of Hazlet, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the Government, and dignity of the same.

FOURTEENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ROBERT CRAVEN and ARMANDO PAZO, on or about March 19, 2009, in or about the Borough of Keansburg and/or the Township of Hazlet, County of

Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under their control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions of 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.

FIFTEENTH COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ROBERT CRAVEN and ARMANDO PAZO, on or about March 19, 2009, in or about the Borough of Keansburg and/or the Township of Hazlet, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, contrary to the provisions of 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.

SIXTEENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that CHRISTOPHER CONNALLON, on or about April 7, 2009, in or about the Borough of

Union Beach, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

SEVENTEENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that CHRISTOPHER CONNALLON, on or about April 7, 2009, in or about the Borough of Union Beach, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under his control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

EIGHTEENTH COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that CHRISTOPHER CONNALLON, on or about April 7, 2009, in or about the Borough of

Union Beach, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

NINETEENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

ON OR WITHIN 1,000 FEET OF SCHOOL PROPERTY

WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that that CHRISTOPHER CONNALLON, on or about April 7, 2009, in or about the Borough of Union Beach, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance on or within 1,000 Feet of School Property with Intent to Distribute, by knowingly or purposely possessing, or having under his control, a controlled dangerous substance, to wit: heroin, with intent to distribute, while on or within 1,000 feet of school property or property used for school purposes which was owned by or leased to an elementary or secondary school or school board, to wit: Memorial Elementary School, 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.

TWENTIETH COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

ON OR WITHIN 1,000 FEET OF SCHOOL PROPERTY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that that CHRISTOPHER CONNALLON, on or about April 7, 2009, in or about the Borough of Union Beach, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance on or within 1,000 Feet of School Property, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, while on or within 1,000 feet of school property or property used for school purposes which was owned by or leased to an elementary or secondary school or school board, to wit: Memorial Elementary School, 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.

TWENTY FIRST COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JESSICA HENDERSON, on or about April 21, 2009, in or about the Township of Hazlet and/or the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or

purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

TWENTY SECOND COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JESSICA HENDERSON, on or about April 21, 2009, in or about the Township of Hazlet and/or the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under her control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

TWENTY THIRD COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JESSICA HENDERSON, on or about April 21, 2009, in or about the Township of Hazlet and/or the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of

Distribution of a Controlled Dangerous Substance, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

TWENTY FOURTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JESSICA HENDERSON, on or about April 28, 2009, in or about the Township of Hazlet and/or the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

TWENTY FIFTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JESSICA HENDERSON, on or about April 28, 2009, in or about the Township of Hazlet and/or the Township of Middletown, County of Monmouth, and

within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under her control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

TWENTY SIXTH COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JESSICA HENDERSON, on or about April 28, 2009, in or about the Township of Hazlet and/or the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

TWENTY SEVENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

ON OR WITHIN 1,000 FEET OF SCHOOL PROPERTY

WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JESSICA HENDERSON, on or about April 28, 2009, in or about the Township of Hazlet and/or the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance on or within 1,000 Feet of School Property with Intent to Distribute, by knowingly or purposely possessing, or having under her control, a controlled dangerous substance, to wit: heroin, with intent to distribute, while on or within 1,000 feet of school property or property used for school purposes which was owned by or leased to an elementary or secondary school or school board, to wit: Union Avenue Middle School, 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.

TWENTY EIGHTH COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

ON OR WITHIN 1,000 FEET OF SCHOOL PROPERTY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JESSICA HENDERSON, on or about April 28, 2009, in or about the Township of

Hazlet and/or the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance on or within 1,000 Feet of School Property, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, while on or within 1,000 feet of school property or property used for school purposes which was owned by or leased to an elementary or secondary school or school board, to wit: Union Avenue Middle School, 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.

TWENTY NINTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about August 24, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

THIRTIETH COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about August 24, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under her control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

THIRTY FIRST COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about August 24, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

THIRTY SECOND COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about August 25, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

THIRTY THIRD COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about August 25, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under her control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

THIRTY FOURTH COUNT

DISTRIBUTION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about August 25, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Distribution of a Controlled Dangerous Substance, by knowingly or purposely distributing a controlled dangerous substance, to wit: heroin, to an undercover detective from the Monmouth County Prosecutor's Office, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

THIRTY FIFTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about September 13, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

THIRTY SIXTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about September 13, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under her control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

THIRTY SEVENTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

WITH INTENT TO DISTRIBUTE WHILE ON OR WITHIN

500 FEET OF A PUBLIC PARK

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about September 13, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute while on or within 500 Feet of a Public Park, by knowingly or purposely

possessing, or having under her control, a controlled dangerous substance, to wit: heroin, with intent to distribute, while on or within 500 feet of a public park, to wit: Bayshore Waterfront County Park, contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the Government, and dignity of the same.

THIRTY EIGHTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JACQUELIN WIEDEMEYER, on or about November 16, 2009, in or about the Township of Middletown, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: buprenorphine, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

THIRTY NINTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JOEL BENITEZ, on or about October 8, 2009, in or about the Borough of Freehold, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous

Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

FORTIETH COUNT

POSSESSION OF A CONTROLLED DANGEROUS

SUBSTANCE WITH INTENT TO DISTRIBUTE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JOEL BENITEZ, on or about October 8, 2009, in or about the Borough of Freehold, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under her control, a controlled dangerous substance, to wit: heroin, with intent to distribute, contrary to the provisions of N.J.S.A. 2C:35-5b(3), and against the peace of this State, the Government, and dignity of the same.

FORTY FIRST COUNT

RESISTING ARREST

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JOEL BENITEZ, on or about October 8, 2009, in or about the Borough of Freehold, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Resisting Arrest, by purposely preventing or

attempting to prevent C.O., a law enforcement officer with the Freehold Borough Police Department, from effecting an arrest, by using or threatening to use physical force or violence against the law enforcement officer or another or by using any other means to create a substantial risk of causing physical injury to the public servant or another, contrary to the provisions of N.J.S.A. 2C:29-2a(3), and against the peace of this State, the Government, and dignity of the same.

FORTY SECOND COUNT

AGGRAVATED ASSAULT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JOEL BENITEZ, on or about October 8, 2009, in or about the Borough of Freehold, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Aggravated Assault, by attempting to cause, or purposely or knowingly causing, serious bodily injury to C.O., a law enforcement officer with the Freehold Borough Police Department, or by causing such injury recklessly under circumstances manifesting extreme indifference to the value of human life, contrary to the provisions of N.J.S.A. 2C:12-1b(1), and against the peace of this State, the Government, and dignity of the same.

FORTY THIRD COUNT

DISARMING A LAW ENFORCEMENT OFFICER

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that JOEL BENITEZ, on or about October 8, 2009, in or about the Borough of Freehold, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Disarming a Law Enforcement Officer, by knowingly taking or attempting to exercise unlawful control over a firearm or other weapon in the possession of C.O., a law enforcement officer with the Freehold Borough Police Department, while he was acting in the performance of his duties while in uniform or while exhibiting evidence of his authority, contrary to the provisions of N.J.S.A. 2C:12-11a, and against the peace of this State, the Government, and dignity of the same.

FORTY FOURTH COUNT

POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DARYEL RAWLS, on or about November 16, 2009, in or about the Township of Lakewood, County of Ocean, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

FORTY FIFTH COUNT  
POSSESSION OF A CONTROLLED DANGEROUS  
SUBSTANCE WITH INTENT TO DISTRIBUTE  
SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DARYEL RAWLS, on or about November 16, 2009, in or about the Township of Lakewood, County of Ocean, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under his control, a controlled dangerous substance, to wit: heroin, in a quantity of one half ounce or more including any adulterants or dilutants, with intent to distribute, contrary to the provisions of N.J.S.A. 2C:35-5b(2), and against the peace of this State, the Government, and dignity of the same.

FORTY SIXTH COUNT  
POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE  
THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DECTRIC RAWLS, on or about November 16, 2009, in or about the Borough of Matawan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance, by knowingly or purposely obtaining or possessing, either actually or constructively, a controlled dangerous substance, to wit: heroin, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the Government, and dignity of the same.

FORTY SEVENTH COUNT  
POSSESSION OF A CONTROLLED DANGEROUS  
SUBSTANCE WITH INTENT TO DISTRIBUTE  
SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DECTRIC RAWLS, on or about November 16, 2009, in or about the Borough of Matawan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Controlled Dangerous Substance with Intent to Distribute, by knowingly or purposely possessing, or having under his control, a controlled dangerous substance, to wit: heroin, in a quantity of one half ounce or more including any adulterants or dilutants, with intent to distribute, contrary to the provisions of N.J.S.A. 2C:35-5b(2), and against the peace of this State, the Government, and dignity of the same.

FORTY EIGHTH COUNT  
POSSESSION OF A FIREARM IN THE  
COURSE OF COMMITTING A DRUG OFFENSE  
SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that DECTRIC RAWLS, on or about November 16, 2009, in or about the Borough of Matawan, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Firearm in the Course of Committing a Drug Offense, by possessing a firearm while in the course of committing, attempting to commit, or conspiring to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions

of N.J.S.A. 2C:39-4.1a, and against the peace of this State, the Government, and dignity of the same.

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LUIS A. VALENTIN  
PROSECUTOR  
MONMOUTH COUNTY

Endorsed:

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Foreperson