



OFFICE OF THE PROSECUTOR

County of Atlantic

4997 Unami Boulevard
P.O. Box 2002
Mays Landing, NJ 08330

Damon G. Tyner
Prosecutor

(609) 909-7800 • Fax: (609) 909-7806

February 4, 2020

Ed
Opramachine.com

Re: Open Public Records Act Request #20-10

Dear Ed:

This letter is in response to your public records request under the Open Public Records Act and common law, received by this agency via email on February 3, 2020, seeking documents pertaining to the matters on which Ameer Stephens and Siddiq Diaab were sentenced on August 2, 2019.

Under the Open Public Records Act (OPRA), N.J.S.A. 47:1A-1 et seq., criminal investigatory records do not constitute government records and, hence, are not subject to disclosure. "A government record shall not include...criminal investigatory records[.]" N.J.S.A. 47:1A-1.1. To constitute a criminal investigatory record, the record "(1) must not be 'required by law to be made,' and (2) must 'pertain[] to a criminal investigation.'" North Jersey Media Group, Inc. v. Twp. of Lyndhurst, 229 N.J. 541, 564 (2017) (quoting N.J.S.A. 47:1A-1.1).

With the exception of the complaints, indictments, and press release regarding Stephens's and Diaab's sentencings, the documents you request are exempt from disclosure as criminal investigatory records. You also have not established your entitlement to those documents under common law. See North Jersey Media Group Inc. v. Bergen County Prosecutor's Office, 447 N.J. Super. 182, 210 (App. Div. 2016). Furthermore, regarding your request for "[interoffice] emails pertaining to plea disposition and disposition of seized property and/or vehicles": To the extent such emails exist, they are privileged against disclosure as attorney work product. See O'Boyle v. Borough of Longport, 218 N.J. 168, 188 (2014) ("Documents that satisfy the OPRA definition of government record are not subject to public access if they fall within the work-product doctrine.").

Enclosed please find the complaints, indictments, and press release concerning the cases on which Ameer Stephens and Siddiq Diaab were sentenced on August 2, 2019.

Very truly yours,

A handwritten signature in black ink, appearing to read "John J. Santoliquido". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

John J. Santoliquido
Assistant Prosecutor
Custodian of Records

Enclosures

COMPLAINT - WARRANT

COMPLAINT NUMBER

0102 W 2016 002787

THE STATE OF NEW JERSEY

VS.

DIAAB SIDDIQ

ATLANTIC CITY MUNICIPAL COURT
2715 ATLANTIC AVE
ATLANTIC CITY NJ 08401-0000
609-347-5560 COUNTY OF: ATLANTIC

ADDRESS: 30 CLUBHOUSE LANE
MAYS LANDING NJ 08330-0000

of CHARGES 3 CO-DEFTS POLICE CASE #: 15-068132

COMPLAINANT DARRIN LORADY
NAME: 2715 ATLANTIC AVE
ATTN: WARRANTS
ATLANTIC CITY NJ 08401

DEFENDANT INFORMATION
SEX: M EYE COLOR: BLACK DOB: 07/02/1969
DRIVER'S LIC. #. DL STATE:
SOCIAL SECURITY #: 156-35-2041 SBI #: 512657B
TELEPHONE #:

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 06/27/2016 in ATLANTIC CITY, ATLANTIC County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY POSSESS A CONTROLLED DANGEROUS SUBSTANCE TO WIT HEROIN. THIS IN VIOLATION OF NJS 2C:35-10A(1). A CRIME OF THE 3RD DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY POSSESS WITH INTENT TO DISTRIBUTE A CONTROLLED DANGEROUS SUBSTANCE TO WIT HEROIN OVER 1/2 OUNCE. THIS IN VIOLATION OF NJS 2C:35-5B(2). A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY POSSESS CDS WITH INTENT TO DISTRIBUTE WITHIN 1000 FEET OF A SCHOOL SPECIFICALLY BY POSSESSING 3.8 OUNCES OF RAW HEROIN WITHIN 1000 OF THE MARTIN LUTHER KING SCHOOL COMPLEX. THIS IN VIOLATION OF NJS 2C:35-7A. A CRIME OF THE THIRD DEGREE.

in violation of:

Original Charge	1) 2C:35-10A(1)	2) 2C:35-5B(2)	3) 2C:35-7A
Amended Charge			

CERTIFICATION:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Signed: DARRIN LORADY Date: 06/28/2016

DATE OF FIRST APPEARANCE 06/28/2016 TIME 08:30PM DATE OF ARREST 06/27/2016

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator Date Signature of Judge Date

☐ Probable cause IS found for the issuance of this complaint.

Signature and Title of Judicial Officer Issuing Warrant Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: 300,000.00 FULL by:

(if different from judicial officer that issued warrant)

☐ Domestic Violence - Confidential

☐ Related Traffic Tickets or Other Complaints

☐ Serious Personal Injury/ Death Involved

Special conditions of release:

☐ No phone, mail or other personal contact w/victim

☐ No possession firearms/weapons

☒ Other (specify):

W2016-002789
W2016-002788

ORIGINAL

COMPLAINT – WARRANT (Court Action)

COMPLAINT NUMBER

0102

W

2016

002787

STATE V.

DIAAB SIDDIQ

FTA Bail Information

Date Bail Set:

Amount Bail Set: \$

by:

☐ Bail Recog. AttachedReleased
on Bail
(v)

R.O.R.

Committed
DefaultCommitted
w/o Bail

Place Committed:

Date Referred to

County Prosecutor:

Date of First

Appearance:

06/28/2016

☐ Advised of Rights by

Defendant Desires Counsel:

☐ Yes ☐ No

Prosecuting Attorney Information

Defense Counsel Information

Name:

Name:

State

County

Municipal

Other

None

Retained

Public Def

Assigned

Waived

Other

Original Charge

1) 2C:35-10A(1)

2) 2C:35-5B(2)

3) 2C:35-7A

Amended Charge

Waiver Indt/Jury

Plea/Date of Plea

Plea:

Date:

Plea:

Date:

Plea:

Date:

Adjudication (* see code)

Finding
Code:

Date:

Finding
Code:

Date:

Finding
Code:

Date:

Jail Term

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Probation Term

Susp. Imp

Susp. Imp

Susp. Imp

Cond. Discharge Term

Community Service

D/L Suspension Term

Fines/Costs

Fines:

Costs:

Fines:

Costs:

Fines:

Costs:

VCCB/SNSF

VCCB:

SNSF:

VCCB:

SNSF:

VCCB:

SNSF:

DEDR/Lab Fee

DEDR:

LAB:

DEDR:

LAB:

DEDR:

LAB:

CD Fee/Drug Ed Fnd

CD:

DAEF:

CD:

DAEF:

CD:

DAEF:

DV Surch/Other Fees

DV:

Other:

DV:

Other:

DV:

Other:

Restitution

Beneficiary:

Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes:
FULL CASH BAIL. BAIL SOURCE HEARING REQUIRED

* Finding Codes

- 1 – Guilty
- 2 – Not Guilty
- 3 – Dismissed – Other
- 4 – Guilty but Merged
- 5 – Dismissed-Rule
- 6 – Dismissed Lack of Prosecution
- 7 – Dismissed – Pros Motion/Vic Req
- 8 – Conditional Discharge
- D – Dismissed- Prosecutor Discretion
- M – Dismissed- Mediation
- P – Dismissed-Plea Agreement
- S – Disposed at Superior
- W – Dismissed-False ID

Related Traffic Tickets and Complaints:

ORIGINAL – Court Action

JUDGE'S SIGNATURE

DATE

Page 2 of 7

NJ-CDR2-3/1/2005

COMPLAINT - WARRANT

COMPLAINT NUMBER			
0102	W	2016	002788
COURT CODE	PREFIX	YEAR	SEQUENCE NO.

ATLANTIC CITY MUNICIPAL COURT
2715 ATLANTIC AVE
ATLANTIC CITY NJ 08401-0000
609-347-5560 COUNTY OF: ATLANTIC

of CHARGES 1 CO-DEFTS POLICE CASE #: 15-068132

COMPLAINANT DARRIN LORADY
NAME: 2715 ATLANTIC AVE
ATTN: WARRANTS
ATLANTIC CITY NJ 08401

THE STATE OF NEW JERSEY

VS.

DIAAB SIDDIQ

ADDRESS: 30 CLUBHOUSE LANE

MAYS LANDING NJ 08330-0000

DEFENDANT INFORMATION
SEX: M EYE COLOR: BLACK DOB: 07/02/1969
DRIVER'S LIC. #. DL STATE:
SOCIAL SECURITY #: 156-35-2041 SBI #: 512657B
TELEPHONE #:

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 06/27/2016 in ATLANTIC CITY, ATLANTIC County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY POSSESS WITH THE INTENT TO DISTRIBUTE A CONTROLLED DANGEROUS SUBSTANCE SPECIFICALLY BY POSSESSING 3.8 OUNCES OF HEROIN WITHIN 500 FEET OF THE ELLIOT HOUSE APARTMENT COMPLEX. THIS IN VIOLATION OF NJS 2C:35-7.1A. A CRIME OF THE THIRD DEGREE. BLANKET BAIL WITH 0102 W 2016 002787 BY JUDGE DELURY

In violation of:

Original Charge	1) 2C:35-7.1A	2)	3)
Amended Charge			

CERTIFICATION:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Signed: DARRIN LORADY Date: 06/28/2016

DATE OF FIRST APPEARANCE 06/28/2016 TIME 08:30AM DATE OF ARREST 06/27/2016

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☐ Probable cause IS found for the issuance of this complaint.

Signature and Title of Judicial Officer Issuing Warrant

Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: by: (if different from judicial officer that issued warrant)

☐ Domestic Violence - Confidential

☐ Related Traffic Tickets or Other Complaints

☐ Serious Personal Injury/ Death Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☒ Other (specify):

W2016-002789
W2016-002787

ORIGINAL

COMPLAINT - WARRANT (Court Action)

COMPLAINT NUMBER

0102

W

2016

002788

STATE V.

DIAAB SIDDIQ

FTA Bail Information

Date Bail Set:

Amount Bail Set: \$

by:

☐ Bail Recog. AttachedReleased
on Bail
(v)

R.O.R.

Committed
DefaultCommitted
w/o Bail

Place Committed:

Date Referred to

County Prosecutor:

Date of First
Appearance: 06/28/2016☐ Advised of Rights by

Defendant Desires Counsel:

☐ Yes ☐ No

Prosecuting Attorney Information

Defense Counsel Information

Name:

State

County

Municipal

Other

Name:

None

Retained

Public Def

Assigned

Waived

Other

Original Charge

1) 2C:35-7.1A

2)

3)

Amended Charge

Waiver Indt/Jury

Plea/Date of Plea

Plea:

Date:

Plea:

Date:

Plea:

Date:

Adjudication (* see code)

Finding
Code:

Date:

Finding
Code:

Date:

Finding
Code:

Date:

Jail Term

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Probation Term

Susp. Imp

Susp. Imp

Susp. Imp

Cond. Discharge Term

Community Service

D/L Suspension Term

Fines/Costs

Fines:

Costs:

Fines:

Costs:

Fines:

Costs:

VCCB/SNSF

VCCB:

SNSF:

VCCB:

SNSF:

VCCB:

SNSF:

DEDL/Lab Fee

DEDL:

LAB:

DEDL:

LAB:

DEDL:

LAB:

CD Fee/Drug Ed Fnd

CD:

DAEF:

CD:

DAEF:

CD:

DAEF:

DV Surch/Other Fees

DV:

Other:

DV:

Other:

DV:

Other:

Restitution

Beneficiary:

Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes:
BLANKET BAIL WITH CDR 0102 W 2016 002787. BAIL SOURCE HEARING REQUIRED.

* Finding Codes

- 1 - Guilty
- 2 - Not Guilty
- 3 - Dismissed - Other
- 4 - Guilty but Merged
- 5 - Dismissed-Rule
- 6 - Dismissed Lack of Prosecution
- 7 - Dismissed - Pros Motion/Vic Req
- 8 - Conditional Discharge
- D - Dismissed- Prosecutor Discretion
- M - Dismissed- Mediation
- P - Dismissed-Plea Agreement
- S - Disposed at Superior
- W - Dismissed-False ID

Related Traffic Tickets and Complaints:

ORIGINAL - Court Action

JUDGE'S SIGNATURE

DATE

Page 2 of 7

NJ CDR 8/1/2006

COMPLAINT - WARRANT

THE STATE OF NEW JERSEY

VS.

DIAAB SIDDIQ

0102

W

2016

002789

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

ATLANTIC CITY MUNICIPAL COURT
2715 ATLANTIC AVE
ATLANTIC CITY NJ 08401-0000
609-347-5560 COUNTY OF: ATLANTIC

ADDRESS: 30 CLUBHOUSE LANE

MAYS LANDING

NJ 08330-0000

of CHARGES 2 CO-DEFTS POLICE CASE #: 15-068132

COMPLAINANT DARRIN LORADY
NAME: 2715 ATLANTIC AVE
ATTN: WARRANTS
ATLANTIC CITY NJ 08401

DEFENDANT INFORMATION
SEX: M EYE COLOR: BLACK DOB: 07/02/1969
DRIVER'S LIC. #. DL STATE:
SOCIAL SECURITY #: 156-35-2041 SBI #: 512657B
TELEPHONE #:

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 06/27/2016 in ATLANTIC CITY, ATLANTIC County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, DID UNLAWFULLY POSSESS A HANDGUN SPECIFICALLY BY HAVING A SEMI AUTOMATIC Kahr Arms handgun model CW9 serial number EG5330 without first obtaining a permit. THIS IN VIOLATION OF NJS 2C:39-5B(1). A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID UNLAWFULLY POSSESS A HANDGUN AFTER BEING PREVIOUSLY CONVICTED IN THE STATE OF NEW JERSEY OF THE CRIME OF DISTRIBUTION OF COCAINE NJS 2C:35-5B(3). THIS IN VIOLATION OF NJS 2C:39-7A. A CRIME OF THE SECOND DEGREE.

BLANKET BAIL WITH CDR 0102 W 2016 002787. \$300,000 NOT BONDABLE BY JUDGE DELURY. BAIL SOURCE HEARING REQUIRED.

in violation of:

Original Charge	1) 2C:39-5B(1)	2) 2C:39-7A	3)
Amended Charge			

CERTIFICATION:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Signed: DARRIN LORADY Date: 06/28/2016

DATE OF FIRST APPEARANCE 06/28/2016 TIME 09:30AM DATE OF ARREST 06/27/2016

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☐ Probable cause IS found for the issuance of this complaint.

Signature and Title of Judicial Officer Issuing Warrant

Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Ball Amount Set: by: (if different from judicial officer that issued warrant)

☐ Domestic Violence - Confidential

☐ Related Traffic Tickets or Other Complaints

☐ Serious Personal Injury/ Death Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
- ☐ No possession firearms/weapons
- ☐ Other (specify):

ORIGINAL

COMPLAINT - WARRANT (Court Action)

COMPLAINT NUMBER

0102**W****2016****002789**

STATE V.

DIAAB SIDDIQ

FTA Bail Information

Date Bail Set:

Amount Bail Set: \$

by:

☐ Bail Recog. AttachedReleased
on Bail
(v)

R.O.R.

Committed
DefaultCommitted
w/o Bail

Place Committed:

Date Referred to

County Prosecutor:

Date of First

Appearance: **06/28/2016**☐ Advised of Rights by

Defendant Desires Counsel:

☐ Yes ☐ No**Prosecuting Attorney Information****Defense Counsel Information****Name:****Name:**

State

County

Municipal

Other

None

Retained

Public Def

Assigned

Waived

Other

Original Charge

1) **2C:39-5B(1)**2) **2C:39-7A**

3)

Amended Charge

Waiver Indt/Jury

Plea/Date of Plea

Plea:

Date:

Plea:

Date:

Plea:

Date:

Adjudication (* see code)

Finding
Code:

Date:

Finding
Code:

Date:

Finding
Code:

Date:

Jail Term

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Probation Term

Susp. Imp

Susp. Imp

Susp. Imp

Cond. Discharge Term

Community Service

D/L Suspension Term

Fines/Costs

Fines:

Costs:

Fines:

Costs:

Fines:

Costs:

VCCB/SNSF

VCCB:

SNSF:

VCCB:

SNSF:

VCCB:

SNSF:

DEDR/Lab Fee

DEDR:

LAB:

DEDR:

LAB:

DEDR:

LAB:

CD Fee/Drug Ed Fnd

CD:

DAEF:

CD:

DAEF:

CD:

DAEF:

DV Surch/Other Fees

DV:

Other:

DV:

Other:

DV:

Other:

Restitution

Beneficiary:

Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes:
COMPANION CASE WITH 0102 W 2016 002787*** Finding Codes**

- 1 - Guilty
- 2 - Not Guilty
- 3 - Dismissed - Other
- 4 - Guilty but Merged
- 5 - Dismissed-Rule
- 6 - Dismissed Lack of Prosecution
- 7 - Dismissed - Pros Motion/Vic Req
- 8 - Conditional Discharge
- D - Dismissed- Prosecutor Discretion
- M - Dismissed- Mediation
- P - Dismissed-Plea Agreement
- S - Disposed at Superior
- W - Dismissed-False ID

Related Traffic Tickets and Complaints:**ORIGINAL - Court Action**

JUDGE'S SIGNATURE

DATE

Page 2 of 7

NY-COR-2-B-1/2005

COMPLAINT - WARRANT

COMPLAINT NUMBER 0102 W-2017 000651			THE STATE OF NEW JERSEY VS. AMEER STEPHENS	
ATLANTIC CITY MUNICIPAL COURT 2715 ATLANTIC AVE ATLANTIC CITY NJ 08401-0000 609-347-5560 COUNTY OF: ATLANTIC			ADDRESS: 17 BROOKLYN AVENUE ATLANTIC CITY NJ 08401-0000	
# of CHARGES 10	CO-DEFTS	POLICE CASE #: ACPO170295	DEFENDANT INFORMATION SEX: M EYE COLOR: BROWN DOB: 07/30/1981 DRIVER'S LIC. #. DL STATE: SOCIAL SECURITY #: 150-72-0684 SBI #: 394183C TELEPHONE #: LIVSCAN PCN #: 019901000348	
COMPLAINANT DARRIN LORADY NAME: 2715 ATLANTIC AVE ATTN: WARRANTS ATLANTIC CITY NJ 08401				

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/06/2017 in **ATLANTIC CITY**, **ATLANTIC County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY POSSESS A CONTROLLED DANGEROUS SUBSTANCE, NAMELY HEROIN, SPECIFICALLY BY BEING IN POSSESSION OF HEROIN, IN VIOLATION OF N.J.S.A. 2C:35-10A (1), A CRIME OF THE THIRD DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY POSSESS WITH INTENT TO DISTRIBUTE A CONTROLLED DANGEROUS SUBSTANCE, NAMELY HEROIN, IN A QUANTITY OF MORE THAN FIVE OUNCES, IN VIOLATION OF N.J.S.A. 2C:35-5B(1), A CRIME OF THE FIRST DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY CONSPIRE WITH ONE OR MORE PERSONS IN A COURSE OF CONDUCT TO UNLAWFULLY MANUFACTURE AND/OR DISTRIBUTE A CONTROLLED DANGEROUS SUBSTANCE, NAMELY HEROIN, IN VIOLATION OF N.J.S.A. 2C:35-3, A CRIME OF THE FIRST DEGREE.

in violation of:

Original Charge	1) 2C:35-10A(1)	2) 2C:35-5B(1)	3) 2C:35-3
Amended Charge			

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment

Signed: **DARRIN LORADY** Date: **03/07/2017**

You will be notified of your **Central First Appearance/CJP** date to be held at the **Superior Court** in the county of **ATLANTIC** at the following address: **ATLANTIC SUPERIOR COURT**
4997 UNAMI BLVD
 Date of Arrest: **03/06/2017** Appearance Date: Time: **MAYS LANDING NJ 08330-0000**
 Phone: **609-625-7000**

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator Date Signature of Judge Date

☒ Probable cause IS found for the issuance of this complaint. **HOWARD FREED JUDICIAL OFFICER 03/07/2017**

Signature and Title of Judicial Officer Issuing Warrant Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: by: (if different from judicial officer that issued warrant)

☐ Domestic Violence - Confidential

☐ Related Traffic Tickets or Other Complaints

☐ Serious Personal Injury/ Death Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

ORIGINAL

COMPLAINT - WARRANT**COMPLAINT NUMBER****0102****W****2017****000651****STATE V.****AMEER STEPHENS**

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY POSSESS WITH INTENT TO DISTRIBUTE A CONTROLLED DANGEROUS SUBSTANCE, NAMELY MARIJUANA, IN A QUANTITY OF ONE OUNCE OR MORE, BUT LESS THAN FIVE POUNDS, IN VIOLATION OF N.J.S.A. 2C:35-5B (11), A CRIME OF THE THIRD DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY POSSESS A CONTROLLED DANGEROUS SUBSTANCE, NAMELY MARIJUANA, SPECIFICALLY BY BEING IN POSSESSION OF MORE THAN 50 GRAMS OF MARIJUANA, IN VIOLATION OF N.J.S.A. 2C:35-10A (3), A CRIME OF THE FOURTH DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY HAVE IN HIS POSSESSION A WEAPON, SPECIFICALLY A HANDGUN DURING THE COMMISSION OF A CONTROLLED DANGEROUS SUBSTANCE OFFENSE, IN VIOLATION OF N.J.S.A. 2C:39-4.1 A, A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY HAVE IN HIS POSSESSION A WEAPON, SPECIFICALLY A HANDGUN WITHOUT FIRST HAVING OBTAINED A PERMIT TO CARRY THE SAME AS PROVIDED IN N.J.S. 2C:58-4, IN VIOLATION OF N.J.S.A. 2C:39-5B(1), A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY HAVE IN HIS POSSESSION A HANDGUN WHILE HAVING BEEN CONVICTED IN THIS STATE OF A CRIME PURSUANT TO THE PROVISIONS OF N.J.S. 2C:35-3 THROUGH N.J.S. 2C:35-6, SPECIFICALLY BY BEING IN POSSESSION OF SAID HANDGUN, IN VIOLATION OF N.J.S.A. 2C:39-7B, A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY HAVE IN HIS POSSESSION OF LARGE CAPACITY AMMUNITION MAGAZINE, IN VIOLATION OF N.J.S.A. 2C:39-3J, A CRIME OF THE FOURTH DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY RECEIVE A MOVABLE PROPERTY KNOWING THAT IT WAS STOLEN, SPECIFICALLY A HANDGUN, IN VIOLATION OF N.J.S.A. 2C:20-7A, A CRIME OF THE THIRD DEGREE.

Original Charge	4) 2C:35-5B(11)	5) 2C:35-10A(3)	6) 2C:39-4.1A
Amended Charge			

COMPLAINT - WARRANT

Page 1 of 7

N.J.C.S. 17:2617

COMPLAINT - WARRANT

COMPLAINT NUMBER

0102

W

2017

000651

STATE V.

AMEER STEPHENS

Original Charge	7) 2C:39-5B(1)	8) 2C:39-7B(1)	9) 2C:39-3J
Amended Charge			

COMPLAINT - WARRANT

Page 1 of 7

03/06/2017

COMPLAINT - WARRANT

COMPLAINT NUMBER

0102**W****2017****000651**

STATE V.

AMEER STEPHENS

COURT CODE PREPARED BY YEAR SEQUENCE NO.

Original Charge

10) 2C:20-7A

Amended Charge

COMPLAINT - WARRANT

Page 1 of 7

NU/CDR 1/1/2017

Prosecutor's File #16002746

DEFENDANTS	D.O.B.	COMPLAINT NO.	PD #
NADIRAH ABDUL-JABBAR	12/11/1985	W-2016-002992-0102 W-2016-002931-0102	ACPO160167
RASHEA ARRINGTON	11/18/1978	W-2016-002938-0102 W-2016-000454-0119	
OMAR BAKER	02/18/1977	W-2016-002920-0102	
AISHA BRATHWAITE	08/15/1981	W-2016-002952-0102	
JAMES BUNDY	09/12/1987	W-2016-002928-0102	
CHARLES BUTLER	10/19/1977	W-2016-002919-0102	
TARIK CHANCE	08/16/1978	W-2016-002946-0102	
AQUELAH COLEY	03/19/1982	W-2016-002918-0102	
JAMES DORSEY	06/25/1986	S-2016-002481-0102 S-2016-002483-0102 W-2016-002934-0102 S-2016-002481-0102	
JAMES FELTON	02/16/1977	W-2016-002921-0102	
JAMAL HALL	08/11/1978	W-2016-002987-0102 W-2016-002950-0102	
NAFIS HAMILTON	10/06/1980	W-2016-002943-0102	
LEWIS HARGROVE	01/10/1981	W-2016-003524-0102 W-2016-002923-0102	
LAMAR IVERSON	11/30/1979	W-2016-002951-0102	
JEFFREY JOHNSON	02/28/1977	W-2016-002988-0102 W-2016-002957-0102	
RONALD JONES	06/07/1982	W-2016-002927-0102	
SADA MAGWOOD	01/22/1991	S-2016-002484-0102 S-2016-002485-0102 W-2016-002945-0102 S-2016-002484-0102	
LYLE MARSHALL	07/13/1972	W-2016-002942-0102	
ARSHAN MCGEE	08/26/1988	W-2016-002940-0102 W-2016-002941-0102	
WASIYM PARKER	11/24/1985	W-2016-002936-0102	
SUSAN POPLAWSKI	05/31/1967	W-2016-002961-0102	
KENYETTA REDD	01/27/1981	W-2016-002944-0102	
TRAN ROOTS	02/24/1980	W-2016-002948-0102	
TROY SANCHEZ	07/29/1975	W-2016-002922-0102	

16-11-2641 BGR

Prosecutor's File #16002746

KALIM SELBY	01/10/1985	W-2016-002949-0102
DELENA SHANNON	06/20/1977	W-2016-002954-0102
DIAB SIDDIQ	07/02/1969	W-2016-002787-0102
		W-2016-002789-0102
		W-2016-002911-0102
		W-2016-002910-0102
		W-2016-002911-0102
YASIN SIMS	06/10/1983	W-2016-002953-0102
AMEER STEPHENS	07/03/1981	W-2016-002913-0102
		W-2016-002914-0102
		W-2016-002916-0102
		W-2016-002990-0102
ANDREA STEPHENS ALLEN	02/15/1985	W-2016-002947-0102
ROLEY D. WHITE	10/07/1963	W-2016-002972-0102
JUAN WIGGINS	10/11/1986	W-2016-002958-0102
AHMAD WILLIAMS	10/22/1994	W-2016-002960-0102
SHAWN WILLIAMS	03/03/1983	W-2016-002959-0102

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STATE OF NEW JERSEY

VS.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL
ATLANTIC COUNTY

DIAB SIDDIQ
AMEER STEPHENS
ARSHAN MCGEE
JAMAL HALL
JEFFREY JOHNSON
ANDREA STEPHENS ALLEN
DELENA SHANNON
NADIRAH ABDUL-JABBAR
RASHEA ARRINGTON
OMAR BAKER
AISHA BRATHWAITE
JAMES BUNDY
ROLEY D WHITE
JUAN WIGGINS
YASIN SIMS
KALIM SELBY
CHARLES BUTLER
TARIK CHANCE
AQUELAH COLEY
JAMES DORSEY
JAMES FITTON

TRAN ROOTS
KENYETTA REDD
NAFIS HAMILTON
LEWIS HARGROVE
LAMAR IVERSON
AHMAD WILLIAMS
SHAWN WILLIAMS
RONALD JONES
SADA MAGWOOD
LYLE MARSHALL
WASIYM PARKER
SUSAN POPLAWSKI
TROY SANCHEZ

SECOND STATED SESSION 2016 TERM

CONSPIRACY TO DISTRIBUTE CDS;
LEADER OF A NARCOTICS TRAFFIKING
NETWORK;
NARCOTICS PRODUCTION FACILITY
POSSESSION OF CDS WITH INTENT TO
DISTRIBUTE; POSSESSION WITH
INTENT TO DIST CDS IN A SCHOOL
ZONE; POSSESSION WITH INTENT TO
DIST CDS IN A PUBLIC ZONE;
UNLAWFUL POSSESSION OF
HANDGUN; POSSESSION OF
HANDGUN BY A CONVICTED
PERSON; POSSESSION OF A
HANDGUN IN THE COURSE OF
POSSESSING CDS WITH INTENT TO
DISTRIBUTE; ENDANGERING CHILD WELFARE

INDICTMENT NO.:

16-11-2641

DEFENDANT(S)

ATLANTIC COUNTY, TO WIT:

THE GRAND JURORS of the State of New Jersey for the County of Atlantic upon their oaths PRESENT THAT:

COUNT 1

On various dates during and between April 18, 2016 and July 7, 2016 in multiple jurisdictions within Atlantic County and within the jurisdiction of this Court,

**DIAB SIDDIQ, AMEER STEPHENS, ARSHAN MCGEE, JAMAL HALL,
JEFFREY JOHNSON, ANDREA STEPHENS ALLEN, DELENA SHANNON,
NADIRAH ABDUL-JABBAR, RASHEA ARRINGTON, OMAR BAKER,
AISHA BRATHWAITE, JAMES BUNDY, ROLEY D WHITE, JUAN WIGGINS,
YASIN SIMS, KALIM SELBY, CHARLES BUTLER, TARIK CHANCE,
AQUELAH COLEY, JAMES DORSEY, JAMES FELTON,
TRAN ROOTS, KENYETTA REDD, NAFIS HAMILTON,
LEWIS HARGROVE, LAMAR IVERSON, AHMAD WILLIAMS, SHAWN WILLIAMS,
RONALD JONES, SADA MAGWOOD, LYLE MARSHALL, WASIYM PARKER,
TROY SANCHEZ AND SUSAN POPLAWSKI**

did agree with such other persons that they or one or more of them would engage in conduct which constitutes the distribution of CDS, by working together in a drug distribution network to manufacture and/or package and/or distribute heroin and/or cocaine in a quantity over 5 ounces throughout Atlantic County, or an attempt to commit such crimes, in violation of N.J.S. 2C:5-2 and N.J.S. 2C:35-5B.

FIRST DEGREE

N.J.S. 2C:5-2; N.J.S. 2C:35-5B

CONSPIRACY TO DISTRIBUTE CDS

COUNT 2

On various dates during and between April 18, 2016 and July 7, 2016 in multiple municipalities within Atlantic County and within the jurisdiction of this Court,

DIAAB SIDDIQ

did conspire with two or more persons in a scheme or course of conduct to unlawfully manufacture and/or distribute and/or dispense heroin and cocaine, which are classified as Schedule I controlled dangerous substances and did act in the capacity of a financier and/or organizer, and/or supervisor and/or manager of at least one other person in the narcotics distribution network, in violation of N.J.S. 2C:35-3.

FIRST DEGREE

N.J.S. 2C:35-3

LEADER OF NARCOTICS TRAFFIKING NETWORK

COUNT 3

On various dates during and between April 18, 2016 and July 7, 2016 in multiple municipalities within Atlantic County and within the jurisdiction of this Court,

AMEER STEPHENS

did conspire with two or more persons in a scheme or course of conduct to unlawfully manufacture and/or distribute and/or dispense heroin and cocaine, which are a classified as Schedule I controlled dangerous substances and did act in the capacity of a financier and/or organizer, and/or supervisor and/or manager of at least one other person in the narcotics distribution network, in violation of N.J.S. 2C:35-3.

FIRST DEGREE

N.J.S. 2C:35-3

LEADER OF NARCOTICS TRAFFIKING NETWORK

COUNT 4

On July 7, 2016 in Hamilton Township, County of Atlantic and within the jurisdiction of this Court,

JEFFREY JOHNSON

did knowingly maintain and operate a premise, place, or facility, located at 6902 Weymouth Road, Mays Landing, used for the manufacture, packaging and distributing of narcotics in violation of N.J.S. 2C:35-4.

FIRST DEGREE

N.J.S. 2C:35-4.

PRODUCTION FACILITY

Prosecutor's File #16002746

COUNT 5

On June 27, 2016, in Egg Harbor Township, County of Atlantic and within the jurisdiction of this Court,

DIAAB SIDDIQ

did knowingly maintain and operate a premise, place, or facility, at 35 B Oxford Village, Egg Harbor Township, used for the manufacture, packaging and distributing of narcotics, in violation of 2C:35-4.

FIRST DEGREE

N.J.S. 2C:35-4.

PRODUCTION FACILITY

COUNT 6

On July 7, 2016 in Galloway Township, County of Atlantic and within the jurisdiction of this Court,

AMEER STEPHENS

did knowingly maintain and operate a premise, place, or facility, located at 492 Genista Avenue, used for the manufacture, packaging and distributing of narcotics in violation of N.J.S. 2C:35-4.

FIRST DEGREE

N.J.S. 2C:35-4.

PRODUCTION FACILITY

COUNT 7

On or about June 27, 2016, in the City of Atlantic City, County of Atlantic and within the jurisdiction of this Court,

DIAAB SIDDIQ

did knowingly or purposely possess a controlled dangerous substance, to wit heroin, in violation of N.J.S. 2C:35-10A(1).

THIRD DEGREE

N.J.S. 2C:35-10A(1)

POSSESSION OF HEROIN

COUNT 8

On or about June 27, 2016, in the City of Atlantic City, County of Atlantic and within the jurisdiction of this Court,

DIAAB SIDDIQ

did knowingly or purposely possess with intent to distribute a controlled dangerous substance, to wit, over one-half ounce of heroin, in violation of N.J.S. 2C:35-5B(2).

SECOND DEGREE

N.J.S. 2C:35-5B(2)

POSSESSION OF CDS WITH INTENT TO DISTRIBUTE – HEROIN

COUNT 9

On or about June 27, 2016, in the City of Atlantic City, County of Atlantic and within the jurisdiction of this Court,

DIAAB SIDDIQ

did knowingly or purposely possess CDS with intent to distribute within 1000 feet of a school , specifically by possessing with intent to distribute over one-half ounce of raw heroin within 1000 feet of the Martin Luther King School Complex, in violation of N.J.S. 2C:35-7A.

THIRD DEGREE

N.J.S. 2C:35-7A

POSSESSION OF CDS WITH INTENT TO DISTRIBUTE IN A SCHOOL ZONE

COUNT 10

On or about June 27, 2016, in the City of Atlantic City, County of Atlantic and within the jurisdiction of this Court,

DIAAB SIDDIQ

did knowingly or purposely possess with the intent to distribute a controlled dangerous substance, specifically heroin, within 500 feet of a public zone, specifically, The Elliot House Apartment Complex, in violation of N.J.S. 2C:35-7.1A.

SECOND DEGREE

N.J.S. 2C:35-7.1A.

POSSESSION OF CDS WITH INTENT TO DISTRIBUTE IN A PUBLIC ZONE

COUNT 12

On or about June 27, 2016, in the Township of Galloway, County of Atlantic and within the jurisdiction of this Court,

DIAAB SIDDIQ

did knowingly possess a handgun, specifically a semi-automatic Khar Arms handgun model CW9 while in the course of committing, attempting to commit, or conspiring to commit a violation of 2C:35-5, specifically, possession of heroin with intent to distribute, in violation of N.J.S. 2C:35-5.

SECOND DEGREE

N.J.S. 2C:39-4.1

POSSESSION OF A GUN IN THE COURSE OF DISTRIBUTING CDS

COUNT 13

On various dates during and between April 18, 2016 and July 7, 2016 in multiple jurisdictions within Atlantic County and within the jurisdiction of this Court,

AMEER STEPHENS

did knowingly or purposely distribute cocaine in a quantity of 5 ounces or more by selling said cocaine to a cooperating individual over several months, in violation of N.J.S. 2C:35-5B(1).

FIRST DEGREE

N.J.S. 2C:35-5B(1)

DISTRIBUTION OF COCAINE

COUNT 11

On or about June 27, 2016, in the Township of Galloway, County of Atlantic and within the jurisdiction of this Court,

DIAAB SIDDIQ

did knowingly, purposely, and unlawfully possess a handgun, specifically a semi-automatic Khar Arms handgun model CW9 without first obtaining a permit for same, in violation of 2C:39-5B(1).

SECOND DEGREE

N.J.S. 2C:39-5B(1)

UNLAWFUL POSSESSION OF A HANDGUN

COUNT 14

On various dates during and between April 18, 2016 and July 7, 2016 in multiple jurisdictions within Atlantic County and within the jurisdiction of this Court,

AMEER STEPHENS

did knowingly or purposely distribute heroin in a quantity over one-half ounce, specifically by distributing heroin in a quantity over one-half ounce to Arshan McGee which was then purchased by a cooperating individual, in violation of N.J.S. 2C:35-5B(2).

SECOND DEGREE

N.J.S. 2C:35-5B(2)

DISTRIBUTION OF HEROIN

COUNT 15

On or about July 7, 2016, in Galloway, County of Atlantic and within the jurisdiction of this Court,

AMEER STEPHENS

did knowingly possess with intent to distribute a controlled dangerous substance, namely, heroin, in a quantity of more than five ounces in violation of N.J.S. 2C:35-5B(1).

FIRST DEGREE

N.J.S. 2C:35-5B(1)

POSSESSION OF CDS WITH INTENT TO DISTRIBUTE – HEROIN

COUNT 16

On or about May 18, 2016, in Hamilton Township, County of Atlantic and within the jurisdiction of this Court,

AMEER STEPHENS

drove his three children under the age of twelve to the location of a drug transaction and he possessed a controlled dangerous substance, namely cocaine with the intent to distribute, in the same vehicle in which he drove his children, thereby causing harm to the children that would make them abused or neglected as defined in R.S. 9:6-1, R.S. 9:6-3 and P.L. 1974 c. 119 s. 1 (C.9:6-8.21) in violation of N.J.S. 2C:24-4(a).

SECOND DEGREE

N.J.S. 2C:24-4(a)

ENGANDERING THE WELFARE OF A CHILD

COUNT 17

On various dates during and between April 18, 2016 and July 7, 2016, in the City of Atlantic City, County of Atlantic and within the jurisdiction of this Court,

ARSHAN MCGEE

did knowingly or purposely distribute a controlled dangerous substance, specifically, heroin in a quantity over one-half ounce to a cooperating individual, in violation of N.J.S. 2C:35-5B(2).

SECOND DEGREE

N.J.S. 2C:35-5B(2)

DISTRIBUTION OF CDS - HEROIN

COUNT 18

On or about July 7, 2016, in the City of Atlantic City, County of Atlantic, and within the jurisdiction of this Court,

LEWIS HARGROVE

did knowingly, purposely, and unlawfully possess a weapon, specifically a Smith and Wesson model M & P .40-caliber handgun ,without first having obtained a permit to carry same as defined in N.J.S. 2C:58-4, in violation of N.J.S. 2C:39-5B.

SECOND DEGREE

N.J.S. 2C:39-5B

UNLAWFUL POSSESSION OF A HANDGUN

COUNT 19

On or about July 7, 2016, in the City of Atlantic City, County of Atlantic and within the jurisdiction of this Court,

LEWIS HARGROVE

did commit the offense of Theft by knowingly possessing a handgun, to wit a Smith and Wesson model M & P .40-caliber handgun, which had been reported stolen out of Atlanta, Georgia, in violation of N.J.S. 2C:20-20-7a.

THIRD DEGREE

N.J.S. 2C:20-20-7a

RECEIVING STOLEN PROPERTY

COUNT 20

On or about June 25, 2016 in the City of Atlantic City, County of Atlantic and in the jurisdiction of this Court,

JAMAL HALL & ROLEY WHITE

did conspire with each other to distribute a controlled dangerous substance, specifically cocaine in a quantity less than one-half ounce, with the purpose of promoting or facilitating the commission of such crimes by agreeing that they would work together in a drug distribution network, in violation of N.J.S. 2C:5-2A(1).

SECOND DEGREE

N.J.S. 2C:5-2A(1)

CONSPIRACY TO DISTRIBUTE COCAINE

COUNT 21

On or about July 7, 2016 in the City of Pleasantville, County of Atlantic, and in the jurisdiction of this Court,

JAMAL HALL

Jamall Hall did knowingly or purposely possess cocaine in a quantity exceeding 5 ounces, in violation of N.J.S. 2C:35-10a(1).

THIRD DEGREE

N.J.S. 2C:35-10a(1)

POSSESSION OF COCAINE

COUNT 22

On or about July 7, 2016 in the City of Pleasantville, County of Atlantic, and in the jurisdiction of this Court,

JAMAL HALL

did knowingly or purposely possess cocaine in a quantity exceeding 5 ounces with the intent to distribute that cocaine, in violation of N.J.S. 2C: 2C:35-5B(2).

FIRST DEGREE

N.J.S. 2C: 2C:35-5B(2)

POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE

COUNT 23

On or about June 25, 2016 in the City of Atlantic City, County of Atlantic and within the jurisdiction of this Court,

ROLEY WHITE

did possess a Schedule I controlled dangerous substance with intent to distribute, specifically cocaine and/or heroin, in violation of N.J.S. 2C:35-10A(1).

THIRD DEGREE

N.J.S. 2C:35-10A(1)

POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE

COUNT 24

On or about June 25, 2016, in the City of Atlantic City, County of Atlantic and in the jurisdiction of this Court,

ROLEY WHITE

did possess a Schedule I controlled dangerous substance with intent to distribute, specifically cocaine and/or heroin, in violation of N.J.S. 2C:35-10A(1).

THIRD DEGREE

N.J.S. 2C:35-10A(1)

POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE

COUNT 25

On or about July 7, 2017, in the City of Pleasantville, County of Atlantic and in the jurisdiction of this Court,

RASHEA ARRINGTON

did knowingly, purposely, and unlawfully possess a weapon, specifically a Taurus Revolver handgun, without first having obtained a permit to carry same as defined in N.J.S. 2C:58-4, in violation of N.J.S. 2C:39-5B.

SECOND DEGREE

N.J.S. 2C:39-5B.

UNLAWFUL POSSESSION OF A HANDGUN

COUNT 26

On or about July 7, 2017, in the City of Pleasantville, County of Atlantic and in the jurisdiction of this Court,

RASHEA ARRINGTON

did knowingly possess a handgun, specifically a Taurus Revolver while in the course of committing, attempting to commit, or conspiring to commit a violation of 2C:35-5, specifically, possession of heroin with intent to distribute, in violation of N.J.S. 2C:35-5.

SECOND DEGREE

N.J.S. 2C:39-4.1

POSSESSION OF A FIREARM IN THE COURSE OF DISTRIBUTING CDS

COUNT 27

On or about July 7, 2016 in the City of Pleasantville, County of Atlantic and in the jurisdiction of this Court,

RASHEA ARRINGTON

did knowingly possess heroin in a quantity exceeding a half-ounce with the intent to distribute that heroin, in violation of N.J.S. 2C: 2C:35-5B(2).

SECOND DEGREE

N.J.S. 2C: 2C:35-5B(2)

POSSESSION OF HEROIN WITH INTENT TO DISTRIBUTE

COUNT 28

On or about June 7, 2016, in Hamilton Township and Atlantic City, County of Atlantic, and within the jurisdiction of this Court,

**TRAN ROOTS, JAMES DORSEY, SADA MAGWOOD LAMAR IVERSON,
AQUILLA COLEY, LEWIS HARGROVE, AMER STEPHENS**

did knowingly possess with the intent to distribute heroin in a quantity exceeding a half-ounce, in violation of N.J.S. 2C: 2C:35-5B(2).

SECOND DEGREE

N.J.S. 2C: 2C:35-5B(2)

POSSESSION OF CDS WITH INTENT TO DISTRIBUTE - HEROIN

COUNT 29

On or about July 7, 2016 in the City of Atlantic City, County of Atlantic, and within the jurisdiction of this Court,

DELENA SHANNON

did knowingly possess a controlled dangerous substance with intent to distribute, specifically heroin, in violation of N.J.S. 2C: 2C:35-5(a)(1).

THIRD DEGREE

N.J.S. 2C: 2C:35-5(a)(1).

POSSESSION OF CDS WITH INTENT TO DISTRIBUTE – HEROIN

COUNT 30

On or about July 7, 2016 in the City of Atlantic City, County of Atlantic, and within the jurisdiction of this Court,

ANDREA STEPHENS – ALLEN

did knowingly possess a controlled dangerous substance with intent to distribute, specifically heroin, in violation of N.J.S. 2C: 2C:35-5(a)(1).

THIRD DEGREE

N.J.S. 2C: 2C:35-5(a)(1).

POSSESSION OF CDS WITH INTENT TO DISTRIBUTE – HEROIN

COUNT 31

On or about July 7, 2016, in Hamilton Township, County of Atlantic, and within the jurisdiction of this Court,

JEFFREY JOHNSON

did knowingly possess with intent to distribute a controlled dangerous substance, namely, heroin, in a quantity of more than five ounces in violation of N.J.S. 2C:35-5B(1).

FIRST DEGREE

N.J.S. 2C:35-5B(1)

POSSESSION OF CDS WITH INTENT TO DISTRIBUTE – HEROIN

COUNT 32

On or about July 7, 2017 in the City of Pleasantville, County of Atlantic and in the jurisdiction of this Court,

RASHAE ARRINGTON

having previously been convicted of the crime of Aggravated Assault did knowingly possess a Taurus Revolver handgun , in violation of N.J.S. 2C:39-7A.

SECOND DEGREE

N.J.S. 2C:39-7A

UNLAWFUL POSSESSION OF A HANDGUN BY A CONVICTED PERSON

COUNT 33

On or about July 7, 2016, in the City of Atlantic City, County of Atlantic and within the jurisdiction of this Court,

LEWIS HARGROVE

having previously been convicted of the crime of Possession of a Controlled Dangerous Substance, in violation of N.J.S. 2C:35-10A(1) on July 30, 1999 , did knowingly possess a Smith and Wesson M & P .40-caliber handgun , in violation of N.J.S. 2C:39-7A.

FOURTH DEGREE

N.J.S. 2C:39-7A

UNLAWFUL POSSESSION OF A HANDGUN BY A CONVICTED PERSON

COUNT 34

On or about June 27, 2016, in the City of Atlantic City, County of Atlantic, and within the jurisdiction of this Court,

DIAAB SIDDIQ

did unlawfully possess a handgun after being previously convicted in the State of New Jersey of the crime of Distribution of Cocaine, N.J.S. 2C:35-5B(3), in violation of N.J.S. 2C:39-7A.

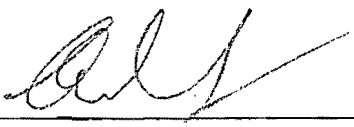
SECOND DEGREE

N.J.S. 2C:39-7A

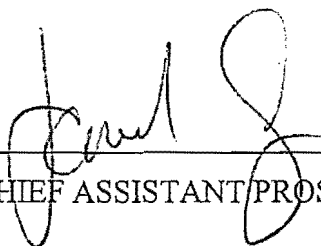
UNLAWFUL POSSESSION OF A HANDGUN BY A CONVICTED PERSON

A True Bill

DIANE M. RUBERTON
ACTING PROSECUTOR



FOREPERSON



CHIEF ASSISTANT PROSECUTOR

NOV 30 2016

Prosecutor's File # 17000797

DEFENDANT
AMEER STEPHENS

D.O.B. COMPLAINT NO. POLICE DEPT.
07/03/1981 W-2017-000651-0102 ACPO170295

Damon G. Tyner
ATLANTIC COUNTY PROSECUTOR
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17-05-1118 66N

STATE OF NEW JERSEY

VS.

AMEER STEPHENS

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL
ATLANTIC COUNTY

FIRST STATED SESSION 2017 TERM

DEFENDANT(S)

CDS - MANU/DIST/PWID -
HEROIN/COCAINE - => 5OZ; POSS
CDS/ANALOG - SCHD I II III IV; CDS -
MANU/DIST/PWID - MARIJ=>1OZ<5LB,
HASH=>5G<1LB; POSS CDS - > 50G
MARIJUANA, 5G HASHISH; UNLAWFUL
POSS WEAPON-HANDGUNS WITHOUT
PERMIT; POSSESSION OF FIREARM
WHILE COMMITTING CDS/BIAS CRIME;
PROHIBITED WEAPONS AND DEVICES -
LARGE CAPACITY AMMO; RECEIVING
STOLEN PROPERTY-KNOWING
PROPERTY IS STOLEN; CERTAIN
PERSONS NOT TO HAVE WEAPONS

INDICTMENT NO.:

ATLANTIC COUNTY, TO WIT:

THE GRAND JURORS of the State of New Jersey for the County of Atlantic upon their oaths,
PRESENT THAT:

Prosecutor's File # 17000797

COUNT 1

On or about the 6th day of March, 2017, in the City of Atlantic City, County of Atlantic,
and within the jurisdiction of this Court,

AMEER STEPHENS

did unlawfully and knowingly or purposely possess with intent to distribute Heroin, in a
quantity of 5 ounces or more; contrary to the provisions of N.J.S. 2C:35-5b(1), against
the peace of this State, the Government and dignity of the same.

FIRST DEGREE

2C:35-5b(1) CDS - MANU/DIST/PWID - HEROIN/COCAINE - => 5OZ

Prosecutor's File # 17000797

COUNT 2

On or about the 6th day of March, 2017, in the City of Atlantic City, County of Atlantic,
and within the jurisdiction of this Court,

AMEER STEPHENS

did unlawfully and knowingly or purposely possess a Controlled Dangerous Substance,
namely Heroin; contrary to the provisions of N.J.S. 2C:35-10a(1), against the peace of
this State, the Government and dignity of the same.

THIRD DEGREE

2C:35-10a(1) POSS CDS/ANALOG - SCHD I II III IV

Prosecutor's File # 17000797

COUNT 3

On or about the 6th day of March, 2017, in the City of Atlantic City, County of Atlantic,
and within the jurisdiction of this Court,

AMEER STEPHENS

possess with intent to distribute
did unlawfully and knowingly or purposely distribute Marijuana in a quantity of 1 ounce
or more; contrary to the provisions of N.J.S. 2C:35-5b(11), against the peace of this
State, the Government and dignity of the same.

THIRD DEGREE

2C:35-5b(11) CDS - MANU/DIST/PWID - MARIJ=>1OZ<5LB, HASH=>5G<1LB

Prosecutor's File # 17000797

COUNT 4

On or about the 6th day of March, 2017, in the City of Atlantic City, County of Atlantic,
and within the jurisdiction of this Court,

AMEER STEPHENS

did unlawfully and knowingly or purposely possess a Controlled Dangerous Substance,
that is, Marijuana in a quantity of more than 50 grams, including any adulterants or
dilutants; contrary to the provisions of N.J.S. 2C:35-10a(3), against the peace of this
State, the Government and dignity of the same.

FOURTH DEGREE

2C:35-10a(3) POSS CDS - > 50G MARIJUANA, 5G HASHISH

COUNT 5

On or about the 6th day of March, 2017 , in the City of Atlantic City, County of Atlantic,
and within the jurisdiction of this Court,

AMEER STEPHENS

knowingly and unlawfully did possess a certain weapon, to wit: a .40 caliber Glock 23
semi-automatic handgun without first having obtained a permit to carry same as provided
in N.J.S. 2C:58-4; contrary to the provisions of N.J.S. 2C:39-5b(1), against the peace
of this State, the Government and dignity of the same.

SECOND DEGREE

2C:39-5b(1) UNLAWFUL POSS WEAPON-HANDGUNS WITHOUT PERMIT

Prosecutor's File # 17000797

COUNT 6

On or about the 6th day of March, 2017, in the City of Atlantic City, County of Atlantic,
and within the jurisdiction of this Court,

AMEER STEPHENS

knowingly or purposely did possess a firearm, that is, a .40 caliber Glock 23 semi-
automatic handgun, while in the course of committing, attempting to commit, or
conspiring to commit a violation of N.J.S. 2C:35-5.

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

SECOND DEGREE

2C:39-4.1a POSSESSION OF FIREARM WHILE COMMITTING CDS/BIAS CRIME

Prosecutor's File # 17000797

COUNT 7

On or about the 6th day of March, 2017, in the City of Atlantic City, County of Atlantic,
and within the jurisdiction of this Court,

AMEER STEPHENS

knowingly and unlawfully did possess a large capacity ammunition magazine; contrary
to the provisions of N.J.S. 2C:39-3j, against the peace of this State, the Government and
dignity of the same.

FOURTH DEGREE

2C:39-3j PROHIBITED WEAPONS AND DEVICES - LARGE CAPACITY AMMO

Prosecutor's File # 17000797

COUNT 9

On or about the 6th day of March, 2017, in the City of Atlantic City, County of Atlantic,
and within the jurisdiction of this Court,

AMEER STEPHENS

having been convicted of the crime of second-degree Possession With Intent to Distribute
CDS on Indictment # 04-07-2653 I, did possess a .40 caliber Glock 23 semi-automatic
handgun;

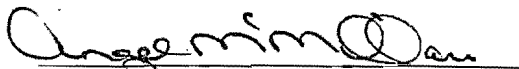
contrary to the provisions of N.J.S. 2C:39-7b, against the peace of this State, the
Government and dignity of the same.

THIRD DEGREE

2C:39-7b CERTAIN PERSONS NOT TO HAVE WEAPONS

A True Bill

Damon G. Tyner
PROSECUTOR


FOREPERSON

MAY 30 2017


ASSISTANT PROSECUTOR
AP ALLISON L. EISELEN



DAMON G. TYNER, PROSECUTOR

OFFICE OF THE ATLANTIC COUNTY PROSECUTOR

(609) 909-7800

4997 Unami Blvd., Suite 2

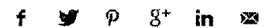
P.O. Box 2002

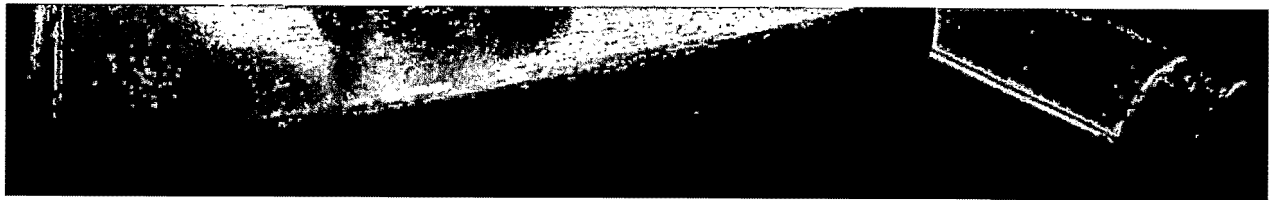
Mays Landing, NJ 08330

ARREST ATLANTIC CITY CHARGES CONVICTED DRUG TRAFFICKING DRUGS EGG HARBOR TOWNSHIP FBI FEATURED GALLOWAY GUILTY HAMILTON TOWNSHIP
HAMMONTON HANDGUN HEROIN INVESTIGATION NARCOTICS PLEASANTVILLE PROSECUTOR SENTENCED SENTENCING TOWNSHIP OF HAMILTON

2 MEN SENTENCED FOR LEADER OF A NARCOTICS TRAFFICKING NETWORK, WEAPONS CHARGES

AUGUST 2, 2019





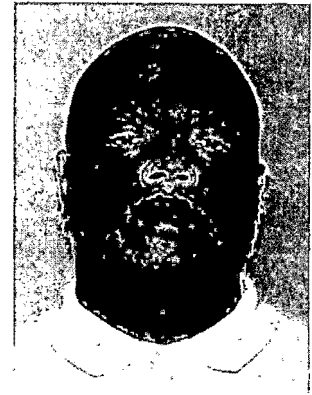
MAYS LANDING— Two men were sentenced to New Jersey state prison on Friday, August 2, 2019, co-defendants Ameer Stephens and Diaab Siddiq (aka "Marshall Davis") were sentenced on charges in connection with a county-wide drug distribution network, Atlantic County Prosecutor Damon G. Tyner announced.

Judge Patricia Wild sentenced Ameer Stephens, 38, Mays Landing, to 24 years New Jersey State Prison with 10 ½ years of parole ineligibility on charges of first-degree Leader of a Narcotics Trafficking Network and second-degree Convicted Person Not to Possess a Handgun.

Presiding Judge Bernard DeLury sentenced Diaab Siddiq (aka "Marshall Davis"), 50, Atlantic City, to 12 years New Jersey State Prison with 8 years of parole ineligibility on charges of first-degree Production Facility, second-degree Possession of Heroin with Intent to Distribute, second-degree Convicted Person Not to Possess a Handgun, and third-degree Money Laundering.



Diaab Siddiq



Ameer Stephens

Stephens was arrested on July 7, 2016, when detectives, police officers, and agents simultaneously executed 19 search warrants for residences and commercial properties in Atlantic City, Galloway Township, Egg Harbor Township, Hamilton Township, Hammonton and Pleasantville. These search warrants resulted in the seizure of 12,225 bags of heroin, approximately 8 ounces of raw, unpackaged heroin, 8 ounces of suspected fentanyl, and about 2 pounds of cocaine. Prior investigations connected to the drug raid yielded additional drugs, cash and weapons. In total, 11 vehicles and \$155,000 in cash were also seized, along with six handguns were seized. The investigation was part of a joint investigation between the Atlantic City Police Department, Atlantic County Prosecutor's Office, FBI and New Jersey State Police.

42-defendants were charged in connection with the narcotics trafficking network and both Ameer Stephens and co-defendant, Diaab Siddiq, 48, of Atlantic City, were indicted as Leaders of the Narcotics Trafficking Network. Stephens, who had posted bail in September, 2016, was detained on March 7, 2017 pursuant to Criminal Justice Reform when police discovered a hidden compartment in Stephens' vehicle containing an illegal handgun and an additional kilo of heroin.

In pleading guilty, Stephens told the court that he acted in capacity of a financier, organizer, supervisor, or manager of other persons in the conspiracy to distribute Heroin and Cocaine throughout Atlantic County in 2016. Stephens also told the court that he illegally possessed a .40 caliber Glock semi-automatic handgun.

These convictions are the result of a joint investigation of the Atlantic County Prosecutor's Office Gangs Guns and Narcotics Unit, Atlantic City Police Department, New Jersey Division of Criminal Justice, New Jersey State Police, the New Jersey Department of Treasury Division of Taxation Office of Criminal Investigation, and the Federal Bureau of Investigations.

Anyone with information involving serious crimes is asked to call the Atlantic County Prosecutor's Office at 609-909-7800 or go to the Prosecutor's Office Web site at <http://www.acpo.org/tips.html> and provide information by filling out the form anonymously on the Submit a Tip page. People can also call Crime Stoppers at 609-652-1234 or