

Prosecutor's File # 13005417

DEFENDANT
APRIL C HILL
CHAIK K HILL
KELEEN SIMPSON

D.O.B.	COMPLAINT NO.	POLICE DEPT.
08/28/1978	W-2013-000347-0107	
	W-2013-000340-0107	
	W-2013-000348-0107	
	W-2013-000341-0107	

JAMES P. McCLAIN
ATLANTIC COUNTY PROSECUTOR
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STATE OF NEW JERSEY

VS.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL
ATLANTIC COUNTY

**APRIL C HILL
CHAIK K HILL
KELEEN SIMPSON**

FIRST STATED SESSION 2015 TERM

DEFENDANT(S)

DISTRIBUTION OF CDS (7 COUNTS);
POSSESSION WITH THE INTENT TO
DISTRIBUTE; POSSESSION OF CDS (7
COUNTS); CONSPIRACY (2 COUNTS);
UNLAWFUL POSSESSION OF A WEAPON;
POSSESSION OF A WEAPON CDS
OFFENSE; CERTAIN PERSON

INDICTMENT NO.:

15-09-2161 E EGN

ATLANTIC COUNTY, TO WIT:

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

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COUNT 1

On or about the 9th day of October, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

did knowingly or purposely distribute a Controlled Dangerous Substance, to wit: Heroin; contrary to the provisions of N.J.S. 2C:35-5b(3), against the peace of this State, the Government and dignity of the same.

THIRD DEGREE

2C:35-5b(3) MFG/DIST/DIS HER/COKE<.5OZ-3RD

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COUNT 2

On or about the 9th day of October, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

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 SCHED I II III IV

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COUNT 3

On or about the 17th day of October, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

did knowingly or purposely distribute a Controlled Dangerous Substance, to wit: Heroin; contrary to the provisions of N.J.S. 2C:35-5b(3), against the peace of this State, the Government and dignity of the same.

THIRD DEGREE

2C:35-5b(3) MFG/DIST/DIS HER/COKE<.5OZ-3RD

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COUNT 4

On or about the 17th day of October, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

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 SCHD I II III IV

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COUNT 5

On or about the 25th day of October, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

did knowingly or purposely distribute a Controlled Dangerous Substance, to wit: Heroin; contrary to the provisions of N.J.S. 2C:35-5b(3), against the peace of this State, the Government and dignity of the same.

THIRD DEGREE

2C:35-5b(3) MFG/DIST/DIS HER/COKE<.5OZ-3RD

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COUNT 6

On or about the 25th day of October, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

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 SCHD I II III IV

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COUNT 7

On or about the 13th day of November, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

did knowingly or purposely distribute a Controlled Dangerous Substance, to wit: Heroin; contrary to the provisions of N.J.S. 2C:35-5b(3), against the peace of this State, the Government and dignity of the same.

THIRD DEGREE

2C:35-5b(3) MFG/DIST/DIS HER/COKE<.5OZ-3RD

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COUNT 8

On or about the 13th day of November, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

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 SCHD I II III IV

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COUNT 9

On or about the 2nd day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

did knowingly or purposely distribute a Controlled Dangerous Substance, to wit: Heroin; contrary to the provisions of N.J.S. 2C:35-5b(3), against the peace of this State, the Government and dignity of the same.

THIRD DEGREE

2C:35-5b(3) MFG/DIST/DIS HER/COKE<.5OZ-3RD

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COUNT 10

On or about the 2nd day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

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 SCHD I II III IV

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COUNT 11

On or about the 9th day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

APRIL C HILL
CHAIK K HILL

did commit the crime of conspiracy in that then and there, with the purpose to facilitate the commission of the crime of distribution of a Controlled Dangerous Substance, to wit: Heroin, they did agree with each other that they would commit said crime; contrary to the provisions of N.J.S. 2C:5-2 and N.J.S. 2C:35-5B(3), against the peace of this State, the Government and dignity of the same.

THIRD DEGREE

2C:5-2 CONSPIRACY

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COUNT 12

On or about the 9th day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

APRIL C HILL
CHAIK K HILL

did knowingly or purposely distribute a Controlled Dangerous Substance, to wit: Heroin; contrary to the provisions of N.J.S. 2C:35-5b(3), against the peace of this State, the Government and dignity of the same.

THIRD DEGREE

2C:35-5b(3) MFG/DIST/DIS HER/COKE<.5OZ-3RD

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COUNT 13

On or about the 9th day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

APRIL C HILL
CHAS K HILL

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 SCHD I II III IV

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COUNT 14

On or about various dates between October 9th, 2013 and December 9th 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

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

SECOND DEGREE

2C:35-5b(2) MFG/D/D HER/COKE>=.5OZ<5OZ 2ND

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COUNT 15

On or about the 18th day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

**APRIL C HILL
CHAIK HILL
KELEEN SIMPSON**

did commit the crime of conspiracy in that then and there, with the purpose to facilitate the commission of the crime of possession of a Controlled Dangerous Substance with the Intent to Distribute, to wit: Heroin, they did agree with each other that they would commit said crime; contrary to the provisions of N.J.S. 2C:5-2 and N.J.S. 2C:35-5B(3), against the peace of this State, the Government and dignity of the same.

THIRD DEGREE

2C:5-2 CONSPIRACY

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COUNT 16

On or about the 18th day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

**APRIL C HILL
CHAIK HILL
KELEEN SIMPSON**

knowingly or purposely did possess with intent to dispense or distribute Heroin, in a quantity of less than one-half ounce;

contrary to the provisions of N.J.S. 2C:35-5a(1) and N.J.S. 2C:35-5B(3), against the peace of this State, the Government and dignity of the same.

THIRD DEGREE

2C:35-5a(1) POSS/DIST/MANUFACTURING/DISPENSING OF CDS

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COUNT 17

On or about the 18th day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

**APRIL C HILL
CHAIK HILL
KELEEN SIMPSON**

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 SCHD I II III IV

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COUNT 18

On or about the 18th day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

knowingly and unlawfully did possess a certain weapon, to wit: .380 High Point Semi-automatic Handgun, Serial Number P903747, 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 OF HANDGUN W/OUT PERMIT TO CARRY/2ND

DEG

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COUNT 19

On or about the 18th day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

did possess a weapon, to wit: .380 High Point Semi-automatic Handgun, Serial Number P903747, while in the course of committing, attempting to commit or conspiring to commit the crime of possession of a controlled dangerous substance with intent to distribute, to wit: Heroin; contrary to the provisions of N.J.S. 2C:39-4.1, against the peace of this State, the Government and dignity of the same.

SECOND DEGREE

2C:39-4.1 COMMITTING A DRUG OFFENSE WHILE POSSESSING FIREARM

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COUNT 20

On or about the 18th day of December, 2013, in the City of Egg Harbor, County of Atlantic, aforesaid, and within the jurisdiction of this Court,

CHAIK HILL

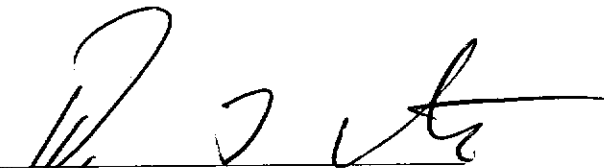
having been convicted of a predicate offense, on Indictment 99-05-0753, Atlantic County, did possess a weapon, to wit: .380 High Point Semi-automatic Handgun, Serial Number P903747; contrary to the provisions of N.J.S. 2C:39-7b, against the peace of this State, the Government and dignity of the same.

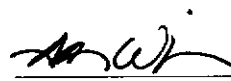
SECOND DEGREE

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

A True Bill

JAMES P. McCLAIN
PROSECUTOR


FOREPERSON


ASSISTANT PROSECUTOR

SEP - 8 2015