

FILED

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**SUPERIOR COURT
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ566-09-16

Superior Court

Docket Number 09-02-00031-S

STATE OF NEW JERSEY)

v.)

CHRISTOPHER NORTH)

INDICTMENT

LEVERNE MCDOWELL)

and)

ELSA SAEZ)

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

COUNT ONE

(Conspiracy - Second Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of robbery, did agree that:

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

B. One or more of them knowingly would aid in the planning, solicitation, or commission of said crime, that is:

1. Knowingly to use force upon another, in the course of committing a theft, while armed with a deadly weapon, contrary to the provisions of N.J.S.A. 2C:15-1(a).

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

COUNT TWO

(Robbery - First Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did use force upon E.C., while armed with a deadly weapon, contrary to the provisions of N.J.S.A. 2C:15-1(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Attempted Murder - First Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court purposely did attempt to cause the death of E.C., by shooting him in the face with a handgun, or aiding in or planning the commission of said shooting, contrary to the provisions of N.J.S.A. 2C:11-3, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Aggravated Assault - Second Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, purposely did cause or attempt to cause serious bodily injury to E.C. by shooting him in the face with a deadly weapon, contrary to the provisions of N.J.S.A. 2C:12-1b(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Unlawful Possession of a Weapon - Second Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

AND

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain firearm, that is, a Raven silver .25 caliber handgun, serial number 243876, while in the course of committing a robbery of E.C., without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5(b), and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did possess a certain firearm, that is, a Raven silver .25 caliber handgun, serial number 243876, with purpose to use it unlawfully against the person or property of another, that is, E.C., contrary to the provisions of N.J.S.A. 2C:39-4(a), and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Endangering an Injured Victim - Third Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did cause bodily injury to E.C. by shooting him in the face, or did solicit, aid, encourage, or attempt or agree to aid another who caused bodily injury to E.C. by shooting him in the face, and did leave the scene of the injury knowing or reasonably believing that E.C. was physically helpless, mentally incapacitated or otherwise unable to care for himself, contrary to the provisions of N.J.S.A. 2C:12-1.2 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Possession of a Weapon by a Convicted Person - Second Degree)

CHRISTOPHER NORTH

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of possessing a weapon for an unlawful purpose, on Bergen County Indictment Number 04-06-01196-I, did purchase, own, possess or control a Raven silver .25 caliber handgun, serial number 243876, while in the course of committing a robbery of E.C., contrary to the provisions of N.J.S.A. 2C:39-7, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Robbery - First Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did use force upon R.C., while armed with a deadly weapon, contrary to the provisions of N.J.S.A. 2C:15-1(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Aggravated Assault - Second Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, purposely did cause or attempt to cause serious bodily injury to R.C. by striking him in the face with a deadly weapon, contrary to the provisions of N.J.S.A. 2C:12-1b(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Unlawful Possession of a Weapon - Second Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Raven silver .25 caliber handgun, serial number 243876, while in the course of committing a robbery of R.C., without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5(b), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

CHRISTOPHER NORTH

LEVERNE MCDOWELL

and

ELSA SAEZ

on or about March 3, 2008, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did possess a certain firearm, that is, a Raven silver .25 caliber handgun, serial number 243876, with purpose to use it unlawfully against the person or property of another, that is, R.C., contrary to the provisions of N.J.S.A. 2C:39-4(a), and against the peace of this State, the government and dignity of the same.