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

State Grand Jury

Number SGJ575-09-11

Superior Court

Docket Number 09-08-00167-S

STATE OF NEW JERSEY)

v.)

ALLEN BROWN)
also known as)
PRINCE)

INDICTMENT

TECORA BROWN)

MARLO TAYLOR)

ARTHUR BROWN)

TECORA L. BROWN)

JEROME ROBINSON)

and)

ANTHONY EVANS)

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

COUNT ONE

(Racketeering - First Degree)

ALLEN BROWN

TECORA BROWN

MARLO TAYLOR

ARTHUR BROWN

TECORA L. BROWN

JEROME ROBINSON

and

ANTHONY EVANS

and other persons whose identities are both known and unknown to the Grand Jurors, some of whom are named as co-conspirators and members of the criminal enterprise but not as defendants herein, at the times and places herein specified, did commit the crime of racketeering, that is, the defendants and other persons employed by or associated with an enterprise engaged in or the activities which affected trade or commerce, knowingly or purposely did conduct or participate directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, in violation of N.J.S.A. 2C:41-2c and N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES

1. The predicate criminal activity occurred between on or about March 10, 1990, and on or about September 12, 2008.

THE RELEVANT PLACES

2. The predicate criminal activity took place at the City of Jersey City and at the City of Bayonne, both in the County of Hudson, at the City of Newark, in the County of Essex, at the City of Paterson, in the County of Passaic, at the City of Elizabeth, in the County of Union, at the City of Camden, in the

County of Camden, at the City of Atlantic City, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

3. ALLEN BROWN, TECORA BROWN, MARLO TAYLOR, ARTHUR BROWN, TECORA L. BROWN, JEROME ROBINSON, and ANTHONY EVANS, all of whom are co-conspirators; and Annie Cooper, who is likewise a conspirator and member of the enterprise although not charged herein; and other persons whose identities are both known and unknown to the State Grand Jurors, would constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise would include the unlawful trafficking of individuals to engage in prostitution in exchange for U.S. currency as follows. The enterprise had a leadership that financed, organized, supervised, and managed the subordinate members in a common course of conduct to hold, recruit, lure, entice, harbor, transport, provide, or obtain, by any means, individuals to engage in prostitution, by threats of serious bodily harm or physical restraint against them; by means of any scheme, plan, or pattern intended to cause the person to believe that the person or any other person would suffer serious bodily harm or physical restraint; and/or by removing and confiscating any document issued by a government agency which could be used as

a means of verifying the person's identity, age, or any other personal identifying information. The leadership of this enterprise would recruit, lure, and entice women to accompany them using different approaches, including by offering controlled dangerous substances, that is, cocaine and heroin, to them. Once the women took the drugs, the leadership would advise the women that they would be required to work off the drug debt by becoming a prostitute for them. The leadership required the women to make a certain amount of money each day or face physical violence. The leadership collected all money and ordered management and other subordinates to control and manipulate the women. The management of the enterprise was tasked with enforcing the rules of the enterprise and disciplining the women in various ways, including but not limited to the infliction of physical violence, for breaking the rules. The enterprise also consisted of subordinates who were responsible for transporting the women to work as prostitutes, obtaining controlled dangerous substances for the women, maintaining the household and vehicles, and confining or physically restraining the women. The enterprise further consisted of individuals who were required to engage in financial transactions involving U.S. currency and property, that is, individuals who made bank deposits or withdrawals, purchased, leased or maintained houses, or purchased or leased vehicles, all in an effort to facilitate the criminal activities of the

enterprise, and to conceal the ownership and source of the property. Through this artifice, the enterprise trafficked a large number of women and forced them into prostitution.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A.2C:41-1d, engaged in by members of the enterprise, did consist of at least two incidents of racketeering conduct during the relevant time period stated above, including but not limited to: distribution and possession with intent to distribute controlled dangerous substances (N.J.S.A. 2C:35-5); money laundering (N.J.S.A. 2C:21-25) involving property valued in excess of \$500,000; theft by extortion (N.J.S.A.2C:20-5); human trafficking (N.J.S.A. 2C: 13-8); promoting prostitution (N.J.S.A. 2C:34-1); failure to file income tax return, N.J.S.A. 54:52-8, failure to pay gross income tax, N.J.S.A. 54:52-9, and conspiracy to commit the foregoing crimes (N.J.S.A. 2C:5-2), which included in part, the use of physical assaults or threats, primarily in the following ways:

ALLEN BROWN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of human trafficking, promoting prostitution, unlawful possession with intent to distribute controlled dangerous substances, unlawful possession of a weapon, criminal coercion, money laundering, failure to file income tax

return, failure to pay gross income taxes, and theft by extortion, all of which is the subject of Counts 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, and 16, as well as prior conduct.

TECORA BROWN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of money laundering, theft by extortion, failure to pay gross income tax, failure to file income tax return, and promoting prostitution, all of which is the subject of Counts 4, 6, 7, 8, 17, and 18 of this Indictment.

ARTHUR BROWN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of human trafficking and promoting prostitution, all of which is the subject of Counts 2 and 4 of this Indictment.

MARLO TAYLOR

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of promoting prostitution and money laundering, which is the subject of Counts 4, 9, and 10 of this Indictment.

TECORA L. BROWN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of promoting prostitution and money

laundering, which is the subject of Counts 4, 19, and 20 of this Indictment.

JEROME ROBINSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of promoting prostitution and money laundering, which is the subject of Counts 4, 19, and 20 of this Indictment.

ANTHONY EVANS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of human trafficking and promoting prostitution, all of which is the subject of Counts 2 and 4 of this Indictment.

All in violation of N.J.S.A. 2C:41-2c, N.J.S.A. 2C:41-2d, and against the peace of this State, the government and dignity of the same.

FORFEITURES

1. All allegations heretofore set forth are hereby incorporated by reference and re-alleged as if fully set forth herein, for the purpose of alleging forfeitures pursuant to N.J.S.A. 2C:41-3b.
2. The defendants have property constituting:
 - A. Interests, including things of value, established, acquired, maintained, operated, controlled, conducted, or participated in violation of N.J.S.A. 2C:41-2c, and N.J.S.A. 2C:41-2d.

3. The said interests, all subject to forfeiture to the State of New Jersey, shall expressly include the following vehicles, that were acquired, maintained, operated, or controlled, in furtherance of the enterprise, for such purposes including but not limited to recruit or transport women for the purpose of engaging in prostitution acquired, maintained, operated, controlled, :

A. One 1999 Dae Woo, gold in color, vehicle identification number KLAJA82ZXXK336031, registered to TECORA BROWN;

B. One 1994 Cadillac DeVille, black in color, vehicle identification number 1G6KF52YIRU230517, registered to MARLO TAYLOR;

C. One 2004 Hummer, H2, white in color, vehicle identification number 5GRGN23U84H101061, registered to TECORA BROWN; and

D. One 1981 Rolls Royce, silver in color, vehicle identification number SCAZS42A2BCX03168, registered to MARLO TAYLOR.

COUNT TWO

(Conspiracy - Second Degree)

ALLEN BROWN

ARTHUR BROWN

and

ANTHONY EVANS

who are named as defendants herein, and other individuals whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about April 26, 2005, and on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of human trafficking and promoting prostitution, did agree that:

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

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

1. Knowingly to hold, recruit, lure, entice, harbor, transport, provide or obtain, by any means, another, to engage in sexual activity with another person in exchange for something of economic value, by threats of serious bodily harm or physical restraint against that person; by means of any scheme, plan or pattern intended to cause the person to believe that the person

or any other person would suffer serious bodily harm or physical restraint; or by removing or confiscating any document issued by a government agency which could be used as a means of verifying the person's identity, age or any other personal identifying information, contrary to the provisions of N.J.S.A. 2C:13-8; and

2. Knowingly to promote prostitution by owning, controlling, managing, supervising, or otherwise keeping alone or in association with another, a prostitution business; encouraging, inducing, or otherwise purposely causing another to become or remain a prostitute; or transporting a person into or within this State with purpose to promote that person's engaging in prostitution, contrary to the provisions of N.J.S.A. 2C:34-1b(2).

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 THREE

(Human Trafficking - First Degree)

ALLEN BROWN

between on or about April 26, 2005, and on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did hold, recruit, lure, entice, harbor, transport, provide or obtain, by any means, M.G., D.T., D.K., and other persons, to engage in prostitution, by:

1) threats of serious bodily harm or physical restraint against the persons or any other person;

2) by means of any scheme, plan or pattern intended to cause the person to believe that the person or any other person would suffer serious bodily harm or physical restraint; or

3) by removing or confiscating any document issued by a government agency which could be used as a means of verifying the person's identity, age or any other personal identifying information, contrary to the provisions of N.J.S.A. 2C:13-8 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Promoting Prostitution - Third Degree)

ALLEN BROWN

TECORA BROWN

MARLO TAYLOR

ARTHUR BROWN

TECORA L. BROWN

JEROME ROBINSON

and

ANTHONY EVANS

between on or about April 26, 2005, and on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did promote prostitution by owning, controlling, managing, supervising, or otherwise keeping alone or in association with another, a prostitution business; encouraging, inducing, or otherwise purposely causing another to become or remain a prostitute; knowingly leasing or otherwise permitting a place controlled by the said ALLEN BROWN, TECORA BROWN, or MARLO TAYLOR, alone or in association with others, to be regularly used for prostitution or promoting prostitution; or transporting a person into or within this State with purpose to promote that person's engaging in prostitution, contrary to the provisions of N.J.S.A. 2C:34-1b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Criminal Coercion - Third Degree)

ALLEN BROWN

between on or about April 26, 2005, and on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to unlawfully restrict M.G., D.T., D.K. and other individuals' freedom of action to engage in or refrain from engaging in conduct, did threaten to inflict bodily injury on the said M.G., D.T., D.K. and other individuals, contrary to the provisions of N.J.S.A. 2C:13-5 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Conspiracy - First Degree)

ALLEN BROWN

and

TECORA BROWN

who are named as the defendants herein, and other individuals whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between in or about August 2000, and on or about September 12, 2008, at the City of Jersey City and at the City of Bayonne, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of money laundering, theft by extortion, and promoting prostitution, did agree that:

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

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

1. To transport or possess property or engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, including but not limited to, human trafficking, promoting prostitution, possession with intent to distribute controlled dangerous substances, and theft by extortion, with a

value of \$500,000 or more, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the said criminal activity, or by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25.

2. To obtain by extortion property of D.K., that is, U.S. currency totaling over \$194,000, by purposely threatening to inflict bodily injury on, physically confine or restrain D.K., or commit any other criminal offense, contrary to the provisions of N.J.S.A. 2C:20-5.

3. Knowingly to promote prostitution by owning, controlling, managing, supervising, or otherwise keeping alone or in association with another, a prostitution business; knowingly leasing or otherwise permitting a place controlled by one of the conspirators, alone or in association with others, to be regularly used for prostitution or promoting prostitution by encouraging, inducing, or otherwise purposely causing another to become or remain a prostitute; or transporting a person into or within this State with purpose to promote that person's engaging

in prostitution, contrary to the provisions of N.J.S.A.

2C:34-1b(2).

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 SEVEN

(Money Laundering - First Degree)

ALLEN BROWN

and

TECORA BROWN

between in or about August 2000, and on or about September 12, 2008, at the City of Jersey City and at the City of Bayonne, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, while engaged in the criminal activity set forth within this Indictment, knowingly did commit the offense of money laundering, in that the said ALLEN BROWN and TECORA BROWN, and other persons whose identities are both known and unknown to the Grand Jurors, did transport or possess property or did engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, including human trafficking, promoting prostitution, possession with intent to distribute controlled dangerous substances, and theft by extortion, with a value of \$500,000 or more, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the said criminal activity, or by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be

derived from criminal activity, that is, the said ALLEN BROWN, TECORA BROWN, and other persons whose identities are both known and unknown to the Grand Jurors, did transport or possess U.S. currency, engage in banking or financial institution transactions, make payments or receive extensions of credit for the purchase and maintenance of real property or the purchase or lease of vehicles variously used to recruit or transport women for the purpose of engaging in prostitution, knowing the property that was transported or possessed was derived from criminal activity; that the transactions involving said property were designed in whole or in part with the intent to facilitate or promote the criminal activity, or to conceal or disguise the nature, location, source, ownership or control of the said property derived through criminal activity; or that direction, organization, financing, planning, managing, supervision, or control of the transportation of or transactions in said property was of property known to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Theft by Extortion - Second Degree)

ALLEN BROWN

and

TECORA BROWN

between in or about March 2005, and in or about August 2006, at the City of Jersey City and at the City of Bayonne, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, purposely did obtain by extortion property of D.K., that is, U.S. currency totaling over \$194,000, by purposely threatening to inflict bodily injury on, physically confine or restrain D.K., or commit any other criminal offense, contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Conspiracy - Third Degree)

ALLEN BROWN

and

MARLO TAYLOR

who are named as defendants herein, and other individuals whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but as defendants herein, between on or about June 6, 2007, and on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of money laundering and promoting prostitution, did agree that:

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

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

1. To transport or possess property or engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, including but not limited to, human trafficking, promoting prostitution, possession with intent to distribute controlled dangerous substances, and theft by extortion, with a value of less than \$75,000, knowing that the transactions were

designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the said criminal activity, or by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b; and

2. Knowingly to promote prostitution by owning, controlling, managing, supervising, or otherwise keeping alone or in association with another, a prostitution business; knowingly leasing or otherwise permitting a place controlled by the conspirators, alone or in association with others, to be regularly used for prostitution or promoting prostitution by encouraging, inducing, or otherwise purposely causing another to become or remain a prostitute; or transporting a person into or within this State with purpose to promote that person's engaging in prostitution, contrary to the provisions of N.J.S.A. 2C:34-1b(2).

OVERT ACT

The Grand Jurors upon their oath do further present that in pursuance of this conspiracy, the following overt act, among others, was committed:

MARLO TAYLOR did engage in transactions involving vehicles, that is, registering vehicles in her name, knowing that the

transactions were designed to conceal or disguise the true ownership or control of the vehicles.

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 TEN

(Money Laundering - Third Degree)

ALLEN BROWN

and

MARLO TAYLOR

between on or about June 6, 2007, and on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, while engaged in the criminal activity set forth within this Indictment, knowingly did commit the offense of money laundering, in that the said ALLEN BROWN and MARLO TAYLOR, and other persons whose identities are both known and unknown to the Grand Jurors, did transport or possess property or did engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, including human trafficking, promoting prostitution, possession with intent to distribute controlled dangerous substances, and theft by extortion, with a value less than \$75,000, by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions involved in property known to be derived from criminal activity, that is, the said ALLEN BROWN and MARLO TAYLOR, and other persons whose identities are both known and unknown to the Grand Jurors, did engage in real estate

transactions, including obtaining a lease for the rental of property used to facilitate the criminal activity, or making payments or receiving extensions of credit to purchase vehicles, variously used to recruit or transport women for the purpose of engaging in prostitution, or registering the said vehicles in the name of MARLO TAYLOR, knowing the property that was transported or possessed was derived from criminal activity; that the transactions involving said property were designed in whole or in part with the intent to facilitate or promote the criminal activity, or to conceal or disguise the nature, location, source, ownership or control of the said property derived through criminal activity; or that direction, organization, financing, planning, managing, supervision, or control of the transportation of or transactions in said property was of property known to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25, N.J.S.A. 2C:21-25b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Possession of Weapons During the
Commission of Certain Crimes - Second Degree)

ALLEN BROWN

on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did possess a weapon, that is, a knife with a seven-inch blade, under circumstances not manifestly appropriate for such lawful uses as the weapon may have, while conspiring to distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

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

ALLEN BROWN

on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a knife, with purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4(d) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Possession With Intent to Distribute a
Controlled Dangerous Substance - Third Degree)

ALLEN BROWN

on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), 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.

COUNT FOURTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

ALLEN BROWN

on or about September 12, 2008, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly or purposely possess a controlled dangerous substance, that is, heroin, a Schedule I narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-10(a)(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Failure to File Tax Return - Third Degree)

ALLEN BROWN

between in or about 1990, and in or about 2008, at the City of Jersey City, in the County of Hudson, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure Law (R.S. 54:48-1 et. seq.), did fail to file a tax return required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Failure to Pay Gross Income Tax - Third Degree)

ALLEN BROWN

between in or about 1990 and in or about 2008, at the City of Jersey City, in the County of Hudson, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et.seq., for the calender years ending 1990 through and inclusive of 2008, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Failure to File Tax Return - Third Degree)

TECORA BROWN

between in or about 1996, and in or about 2006, at the City of Bayonne, in the County of Hudson, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure Law (R.S. 54:48-1 et. seq.), did fail to file a tax return required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Failure to Pay Gross Income Tax - Third Degree)

TECORA BROWN

between in or about 1996 and in or about 2006, at the City of Bayonne, in the County of Hudson, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et.seq., for the calender years ending 1996 through and inclusive of 2006, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Conspiracy - Third Degree)

ALLEN BROWN

TECORA L. BROWN

and

JEROME ROBINSON

who are named as the defendants herein, and other individuals whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between in or about 2005, and on or about September 12, 2008, at the City of Jersey City and at the City of Bayonne, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of money laundering and promoting prostitution, did agree that:

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

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

1. To transport or possess property or engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, including but not limited to, human trafficking, promoting prostitution, possession with intent to distribute

controlled dangerous substances, and theft by extortion, with a value of less than \$75,000, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the said criminal activity, or by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b; and

2. Knowingly to promote prostitution by owning, controlling, managing, supervising, or otherwise keeping alone or in association with another, a prostitution business; knowingly leasing or otherwise permitting a place controlled by the conspirators, alone or in association with others, to be regularly used for prostitution or promoting prostitution; encouraging, inducing, or otherwise purposely causing another to become or remain a prostitute; or transporting a person into or within this State with purpose to promote that person's engaging in prostitution, contrary to the provisions of N.J.S.A. 2C:34-1b(2).

OVERT ACT

The Grand Jurors upon their oath do further present that in pursuance of this conspiracy, the following overt act, among others, was committed:

JEROME ROBINSON did engage in transactions involving vehicles, that is, registering vehicles in his name, knowing that the transactions were designed to conceal or disguise the true ownership or control of the vehicles.

TECORA L. BROWN did transport or possess property or did engage in banking transactions involving U.S. currency known to be, or which a reasonable person would believe to be, derived from criminal activity, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the U.S. currency.

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 TWENTY

(Money Laundering - Third Degree)

ALLEN BROWN


TECORA L. BROWN

and


JEROME ROBINSON

between in or about 2005, and on or about September 12, 2008, at the City of Jersey City and at the City of Bayonne, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, while engaged in the criminal activity set forth within this Indictment, knowingly did commit the offense of money laundering, in that the said ALLEN BROWN, TECORA L. BROWN, and JEROME ROBINSON, and other persons whose identities are both known and unknown to the Grand Jurors, did transport or possess property or did engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, including human trafficking, promoting prostitution, possession with intent to distribute controlled dangerous substances, and theft by extortion, with a value less than \$75,000, by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions involved in property known to be derived from criminal activity, that is, the said ALLEN BROWN, TECORA L. BROWN, and JEROME ROBINSON, and other persons whose identities are both known and unknown to the Grand Jurors,

did engage in financial transactions, including making withdraws of U.S Currencies in bank accounts known to store money generated from the criminal enterprise, making payments or receiving extensions of credit to purchase vehicles, variously used to recruit or transport women for the purpose of engaging in prostitution, or registering the said vehicles in the name of JEROME ROBINSON, knowing the property that was transported or possessed was derived from criminal activity; that the transactions involving said property were designed in whole or in part with the intent to facilitate or promote the criminal activity, or to conceal or disguise the nature, location, source, ownership or control of the said property derived through criminal activity; or that direction, organization, financing, planning, managing, supervision, or control of the transportation of or transactions in said property was of property known to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25, N.J.S.A. 2C:21-25b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.


AAG Deborah L. Gramiccioni
Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 8/7/2009

FILED

AUG 07 2009

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ575-09-11
Superior Court
Docket Number 09-08-00167-S

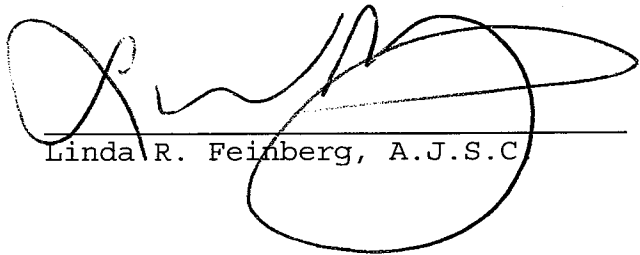
STATE OF NEW JERSEY)
v.)
ALLEN BROWN)
also known as)
PRINCE)
TECORA BROWN)
MARLO TAYLOR)
ARTHUR BROWN)
TECORA L. BROWN)
JEROME ROBINSON)
and)
ANTHONY EVANS)

ORDER OF VENUE

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

IT IS ORDERED on this 7th day of August, 2009, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Hudson be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Hudson for filing.



Linda R. Feinberg, A.J.S.C