FILED

JUN 04 2019

State Grand Jury Judge

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Docket	Numbe	er	I	9	- 0	6	_ () ()	0	5	6	-	1

STATE OF NEW JERSEY)
V.)
CHRISTOPHER STONER)
NICHOLAS CILIEN)
BRYHEEM BELCHER)
)
FABIAN SAPP)
DEVON DAVIS)
DWAYNE HAGANS)
PAUL CORUM)
AND)
MARC FREEMAN)

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 f day of f , 2019, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Camden 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 Camden for filing.

Mary C. Jac(:json, A. J. S-

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JUN 04 2019

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury Number SGJ732-19-6 Superior Court

Docket Number 19-06-00056- \mathbf{S}

V.	v)	INDICTMEN	IT -	
CHRISTOPHER STONER)			
NICHOLAS CILIEN		×.)			4
BRYHEEM .BELCHER)			
)			
FABIAN SAPP)			4
DEVON DAVIS)			
DWAYNE HAGANS)			
PAUL CORUM)			
and			×)			
MARC FREEMAN	100)	×		

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

COUNT ONE

(Conspiracy - Second Degree)

CHRISTOPHER STONER

NICHOLAS CILIEN

BRYHEEM BELCHER

1

FABIAN SAPP

DEVON DAVIS

and

DWAYNE HAGANS

between on or about June 14, 2018, and on or about March 8, 2019, at the Borough of Lindenwold, at the Borough Mt. Ephraim, and at the City of Camden, all in the County of Camden, and at the Borough of Westville, and at the Township of Deptford, both in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of Distribution of a Controlled Dangerous Substance, did agree together, and with a person who e identity is unknown to the Grand Jurors, who at all times relevant to this indictment was an agent of the New Jersey State Police, that:

- 1. One or more of them would engage in conduct which would constitute the aforesaid crime, or
- 2. One or more of them would aid in the planning, solicitation or commission of said crimes, that is:
- A. Knowingly or purposely distribute a controlled dangerous substance, that is, cocaine, in a quantity of five ounces or more, including any adulterants or dilutants, contrary

to the provisions of N.J.S.A. 2C:35 Sa(1), N.J.S.A. 2C:35 Sb(1), N.J.S.A. 2C:35-5c.

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

COUNT TWO

(Distribution of a Controlled Dangerous Substance - First Degree)

CHRISTOPHER STONER

between on or about June 14, 2018, and on or about February 21, 2019, at the Borough of Mt. Ephraim and at the Borough of Lindenwold, both in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-Sa(1), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:35-5(c), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Distribution of a Controlled Dangerous Substance - First Degree)

NICHOLAS CILIEN

between on or about December 6, 2018, and on or about February 21, 2019, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:35-5(c), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Distribution of a Controlled Dangerous Substance - Second , Degree)

BRYHEEM BELCHER

between on or about July 5, 2018, and on or about July 19, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), N.J.S.A. 2C:35-5(c), N.J.S.A. 2C:2-6, and-against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Distribution of a Controlled Dangerous Substance - Second Degree)

on or about October 1, 2018, at the Township of Deptford, in the County of Gloucester, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Distribution of a Controlled Dangerous Substance - Second Degree)

FABIAN SAPP

and

DWAYNE HAGANS

on or about January 31, 2019, at the Borough of Westville, in the County of Gloucester, and at the Borough of Lindenwold, at the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Distribution of a Controlled Dangerous Substance - Second Degree)

DEVON DAVIS

on or about February 21, 2019, at the Borough of Mt. Ephraim, and at the Borough of Lindenwold, both in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), 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 Controlled Dangerous Substance - Third Degree)

CHRISTOPHER STONER

on or about March 8, 2019, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT NINE

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

CHRISTOPHER STONER

on or about March 8, 2019, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TEN

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

CHRISTOPHER STONER

on or about March 8, 2019, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Luger caliber Beretta semiautomatic pistol, serial number NU014459, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1 and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Possession of a Controlled Dangerous Substance - Third Degree)
NICHOLAS CILIEN

on or about March 8, 2019, at the Borough of Mt. Ephraim, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, oxycodone, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Possession of a Controlled Dangerous Substance - Third Degree)

NICHOLAS CILIEN

on or about March 8, 2019, at the Borough of Mt. Ephraim, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, Xanax, a Schedule IV controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

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

NICHOLAS CILIEN

on or about March 8, 2019, at the Borough of Mt. Ephraim, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, oxycodone, a Schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

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

NICHOLAS CILIEN

on or about March 8, 2019, at the Borough of Mt. Ephraim, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, Xanax, a Schedule IV narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(13), and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

DWAYNE HAGANS

on or about March 8, 2019, at the Borough of Westville, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

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

DWAYNE HAGANS

on or about March 8, 2019, at the Borough of Westfield, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more but less than five ounces, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Conspiracy - Third Degree)

CHRISTOPHER STONER

NICHOLAS CILIEN

PAUL CORUM

and

MARC FREEMAN

between on or about July 26, 2018, and on or about March 14, 2019, at the Borough of Lindenwold, and at the Borough of Mt. Ephraim, both in the County of Camden, in the State of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Manufacture, Transport, Ship, Sell, or Disposition of an Assault Firearm; Manufacture, Transport, Ship, Sell, or Disposition of a Sawed-Off Shotgun, and Purchasing Firearm Parts to Manufacture Untraceable Firearms, did agree together, and with a person whose identity is unknown to the Grand Jurors, who at all times relevant to this indictment was an agent of the New Jersey State Police, that:

- One or more of them would engage in conduct which would constitute the aforesaid crime, or
- 2. One or more of them would aid in the planning, solicitation or commission of said crimes, that is:

- A. Knowingly manufacture, transport, ship, sell, or dispose of an assault firearm, without having been licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g.
- B. Knowingly did transport, ship, sell, or dispose of a sawed-off shotgun, contrary to the provisions of N.J.S.A. 2C:39-9b.
- untraceable firearms, that is, six assault firearms, without having been licensed or registered to do so as provided in chapter 58, by purchasing separately or as a kit any combination of parts from which a firearm without a serial number may be readily assembled, but which does not have the capacity to function as a firearm unless manufactured or otherwise assembled, contrary to the provisions of N.J.S.A. 2c:39-9k.

OVERT ACTS

In pursuance of the said conspiracy, the following OVERT ACTS, among others were committed:

- 1. Stoner and Cilien ordered eight assault firearms from Corum between July 2018 and March 14, 2019.
- 2. Corum placed the orders with Freeman and Stoner and Cilien paid Corum for the firearms.

- 3. Freeman ordered the parts for the eight assault firearms, and assembled the firearms after the parts were shipped to him in New Jersey and Pennsylvania.
- 4. After the firearms were assembled, Corum transported the weapons to Stoner and/or Cilien, and Stoner sold the assault firearms to a New Jersey State Police Cooperating Witness.

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 EIGHTEEN

(Unlawful Possession of an Assault Firearm - Second Degree)

PAUL CORUM

and

MARC FREEMAN

on or about July 26, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession an assault firearm, that is, a 5.56 x 45mm caliber semiautomatic assault rifle, identification number NJ1806543, contrary to the provisions of N.J.S.A. 2C:39-5f, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Possession of a Sawed-Off Shotgun - Third Degree)

PAUL CORUM

and

MARC FREEMAN

on or about July 26, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a sawed-off shotgun, contrary to the provisions of N.J.S.A. 2C:39-3b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Manufacture, Transport, Disposition of an Assault Firearm - Third Degree)

PAUL CORUM

MARC FREEMAN

and

CHRISTOPHER STONER

on or about July 26, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture, transport, ship, sell, or dispose of an assault firearm, that is, a 5.56 x 45mm caliber assault rifle, identification number NJ1806543, without having been licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Manufacture, Transport, Disposition of an Sawed-Off Shotgun - Third Degree)

PAUL CORUM

MARC FREEMAN

and

CHRISTOPHER STONER

on or about July 26, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture, transport, ship, sell, or dispose of a sawed-off shotgun, that is, a 5.56 x 45mm caliber rifle, identification number NJ1806543, contrary to the provisions of N.J.S.A. 2C:39-9b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Unlawful Possession of an Assault Firearm - Second Degree)

PAUL CORUM

and

MARC FREEMAN

on or about August 7, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession an assault firearm, that is, a 7.26 x 39mm caliber semiautomatic assault rifle, identification number NJ1806543-12, contrary to the provisions of N.J.S.A. 2C:39-5f, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Manufacture, Transport, Disposition of an Assault Firearm - Third Degree)

PAUL CORUM

MARC FREEMAN

and

CHRISTOPHER STONER

on or about August 7, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture, transport, ship, sell, or dispose of an assault firearm, that is, a 7.26 x 39mm caliber assault rifle, identification number NJ1806543-12, without having been licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Unlawful Possession of an Assault Firearm - Second Degree)

PAUL CORUM

MARC FREEMAN

and

NICHOLAS CILIEN

on or about September 5, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession an assault firearm, that is, a 5.56 x 45mm NATO caliber semiautomatic assault rifle, identification number NJ1806543-13, contrary to the provisions of N.J.S.A. 2C:39-5f, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Manufacture, Transport, Disposition of an Assault Firearm - Third Degree)

PAUL CORUM

MARC FREEMAN

NICHOLAS CILIEN

and

CHRISTOPHER STONER

on or about September 5, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture, transport, ship, sell, or dispose of an assault firearm, that is, a 5.56 x 45mm NATO caliber semiautomatic assault rifle, identification number NJ1806543-13, without having been licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Unlawful Possession of an Assault Firearm - Second Degree)

PAUL CORUM

MARC FREEMAN

NICHOLAS CILIEN

and

CHRISTOPHER STONER

on or about December 6, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession an assault firearm, that is, a 9mm Luger caliber semiautomatic pistol, identification number NJ1806543-20, contrary to the provisions of N.J.S.A. 2C:39-5f, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Manufacture, Transport, Disposition of an Assault Firearm - Third Degree)

PAUL CORUM

MARC FREEMAN

NICHOLAS CILIEN

and

CHRISTOPHER STONER

on or about December 6, 2018, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture, transport, ship, sell, or dispose of an assault firearm, that is, a 9mm Luger caliber semiautomatic pistol, identification number NJ1806543-20, without having been licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Unlawful Possession of an Assault Firearm - Second Degree)

PAUL CORUM

MARC FREEMAN

NICHOLAS CILIEN

and

CHRISTOPHER STONER

on or about February 11, 2019, at the Borough of Lindenwold, and at the Borough of Mt. Ephraim, both in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession an assault firearm, that is, a 5.56 x 45mm caliber semiautomatic rifle, identification number NJ1806543-22, and/or a 5.56 x 45mm caliber semiautomatic rifle, identification number NJ1806543-23, contrary to the provisions of N.J.S.A. 2C:39-5f, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Manufacture, Transport, Disposition of an Assault Firearm - Third Degree)

PAUL CORUM

MARC FREEMAN

NICHOLAS CILIEN

and

CHRISTOPHER STONER

on or about February 11, 2019, at the Borough of Lindenwold, and at the Borough of Mt. Ephraim, both in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture, transport, ship, sell, or dispose of an assault firearm, that is, a 5.56 x 45mm caliber semiautomatic rifle, identification number NJ1806543-22, and/or a 5.56 x 45mm caliber semiautomatic rifle, identification number NJ1806543-23, without having been licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Purchasing Firearm Parts to Manufacture Untraceable Firearm - Third Degree)

PAUL CORUM

MARC FREEMAN

NICHOLAS CILIEN

and

CHRISTOPHER STONER

between on or about November 8, 2018, and on or about December 6, 2018, at the Borough of Lindenwold, at the Borough of Mt. Ephraim, in the State of Pennsylvania, elsewhere, and within the jurisdiction of this Court, purposely manufactured or otherwise assembled an untraceable firearm, that is, a 9mm Luger caliber semiautomatic pistol, identification number NJ1806543-20, without having been licensed or registered to do so as provided in chapter 58, by purchasing separately or as a kit any combination of parts from which a firearm without a serial number may be readily assembled, but which does not have the capacity to function as a firearm unless manufactured or otherwise assembled, contrary to the provisions of N.J.S.A. 2C:39-9k, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Purchasing Firearm Parts to Manufacture Untraceable Firearm - Third Degree)

PAUL CORUM

MARC FREEMAN

NICHOLAS CILIEN

and

CHRISTOPHER STONER

between on or about February 4, 2019, and on or about February 11, 2019, at the Borough of Lindenwold, at the Borough of Mt. Ephraim, in the State of Pennsylvania, elsewhere, and within the jurisdiction of this Court, purposely manufactured or otherwise assembled untraceable firearms, that is, a 5.56 x 45mm caliber semiautomatic rifle, identification number NJ1806543-22, and/or a 5.56 \times 45mm caliber semiautomatic rifle, identification number NJ1806543-23, without having been licensed or registered to do so as provided in chapter 58, by purchasing separately or as a kit any combination of parts from which a firearm without a serial number may be readily assembled, but which does not have the capacity to function as a firearm unless manufactured or otherwise assembled, contrary to the provisions of N.J.S.A. 2C:39-9k, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Purchasing Firearm Parts to Manufacture Untraceable Firearm - Third Degree)

PAUL CORUM

MARC FREEMAN

NICHOLAS CILIEN

and

CHRISTOPHER STONER

between on or about February 24, 2019, and on or about March 14, 2019, at the Borough of Lindenwold, at the Borough of Mt.

Ephraim, in the State of Pennsylvania, elsewhere, and within the jurisdiction of this Court, purposely purchased or otherwise obtained separately or as part of a kit a firearm frame or firearm receiver, which was not imprinted with a serial number registered with a federal licensed manufacturer, to manufacture untraceable firearms, without having been licensed or registered to do so as provided in chapter 58, contrary to N.J.S.A. 2C:39-9k, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Unlawful Possession of an Undetectable Firearm - Third Degree)

MARC FREEMAN

on or about March 8, 2019, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess un undetectable firearm, that is, a .40 S&W caliber Polymer 80 semiautomatic pistol, identification number NJ1806543-38, contrary to the provisions of N.J.S.A. 2C:39-3m, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Manufacture, Transport, Disposition of an Assault Firearm - Third Degree)

MARC FREEMAN

on or about March 8, 2019, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture an undetectable firearm, that is, a .40 S&W caliber Polymer 80 semiautomatic pistol, identification number NJ1806543-38, contrary to the provisions of N.J.S.A. 2C:39-9m and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Certain Persons Not to Have Weapons - Second Degree)

NICHOLAS CILIEN

between on or about July 26, 2018, and on or about March 8, 2019, at the Borough of Lindenwold, and at the Borough of Mt. Ephraim, both in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Third Degree Distribution/Possession with Intent to Distribute a Controlled Dangerous Substance within 1,000 feet of School Property in Camden County, on indictment number CAM011003014I, did purchase, own, possess or control the following firearm: a 5.56 x 45mm NATO caliber semiautomatic assault rifle, identification number NJ1806543-13; or a 9mm Luger caliber semiautomatic pistol, identification number NJ1806543-20; or a 5.56 x 45mm caliber semiautomatic rifle, identification number NJ1806543-22; or a 5.56 x 45mm caliber semiautomatic rifle, identification number NJ1806543-23; or a .38 Special caliber Charter Arms revolver, serial number 14-28823; or a 12-gauge Remington pump action shotgun, serial number RS17411P, 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 THIRTY-SIX

(Certain Persons Not to Have Weapons - Second Degree)

MARC FREEMAN

between on or about July 26, 2018, and on or about March 8, 2019, at the Borough of Lindenwold, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of a crime involving domestic violence as defined in N.J.S.A. 2C:25-19, in Camden County on family order number FO-08-000284-09, did purchase, own, possess or control the following firearm: a 5.56 x 45mm NATO caliber semiautomatic assault rifle, identification number NJ1806543-13; or a 9mm Luger caliber semiautomatic pistol, identification number NJ1806543-20; or a 5.56 \times 45mm caliber semiautomatic rifle, identification number NJ1806543-22; or a 5.56 \times 45mm caliber semiautomatic rifle, identification number NJ1806543-23, or a .40 S&W caliber Polymer 80 semiautomatic pistol, identification number NJ1806543-38, or a .22 caliber Glock model semiautomatic handgun, serial number CZG355; or a 12-gauge Remington pump action shotgun, serial number B168678M, contrary to the

provisions of $\underline{\text{N.J.S.A.}}$ 2C:39 7, and against the peace of this State, the government and dignity of the same.

BY:

AAC Veronica Allende

Director

Division of Criminal Justice

A TRUE BILL:

Clein

6 4 2019

Foreperson