

FILED
APRIL 20, 2021
STATE GRAND JURY JUDGE

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ755-21-1
Superior Court
Docket Number: 21-4-43-S

STATE OF NEW JERSEY)
v.)
KOI ALLEN)
and)
TYRIK JOHNSON)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

KOI ALLEN

and

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of possession with intent to distribute a controlled dangerous substance, did agree that:

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

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

1. Knowingly or purposely 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:35-5(a) (1) and N.J.S.A. 2C:35-5 (b) (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 TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

KOI ALLEN

and

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10(a)(1), and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

KOI ALLEN

and

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, 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:35-10(a)(1), and against the peace of this State, the government and dignity of the same.

COUNT FOUR

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

KOI ALLEN

and

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, 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:35-5(a)(1), N.J.S.A. 2C:35-5(b)(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

(Possession with Intent to Distribute a Controlled Dangerous Substance Within 1,000 Feet of School Property - Third Degree)

KOI ALLEN

and

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, 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 violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Greenwood Elementary School, which is owned by or leased to the Hamilton Township Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Unlawful Possession of a Weapon - Second Degree)

KOI ALLEN

and

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Luger caliber FN semiautomatic pistol, serial number GSK0016923, 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 SEVEN

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

KOI ALLEN

and

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Luger caliber FN semiautomatic pistol, serial number GSK0016923, while in the course of committing or attempting to commit a violation of N.J.S.A. 3C:35-5a(1), contrary to the provisions of N.J.S.A. 2C:39-4.1(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Possession of Hollow Nose Bullets - Fourth Degree)

KOI ALLEN

and

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon or device, that is, hollow nose bullets, contrary to the provisions of N.J.S.A. 2C:39-3f, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Unlawful Possession of a Large Capacity
Ammunition Magazine - Fourth Degree)

KOI ALLEN

and

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3(j), and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Certain Persons Not to Have Weapons - Second Degree)

TYRIK JOHNSON

on or about January 19, 2021, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of second-degree unlawful possession of a weapon in Mercer County, on Indictment number 17-10-00173-S, and/or third-degree possession with intent to distribute a controlled dangerous substance in Mercer County, on Accusation number 15-12-00556-A, did purchase, own, possess, or control the following firearm: a 9mm Luger caliber FN semiautomatic pistol, serial number GSK0016923, contrary to the provisions of N.J.S.A. 2C:39-7(b), and against the peace of this State, the government and dignity of the same.

AAG Veronica Allende

Director
Division of Criminal Justice

BY: *Lauren S. Yfantis*

DAG Lauren Yfantis
Chief, Division of Criminal Justice

A TRUE BILL:

Foreperson

Dated: **4/20/21**