

FILED
May 4, 2021
STATE GRAND JURY JUDGE

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL
State Grand Jury
Number SGJ755-21-5
Superior Court
Docket Number 21-5-61-S

STATE OF NEW JERSEY)
v.)
KEVIN BROWN)
AND)
TYESHA ST-LOUIS)
)
)
)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

KEVIN BROWN

and

TYESHA ST-LOUIS

who are named as defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, on or about

December 22, 2020, at the City of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of distribution of 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, heroin, 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) and N.J.S.A. 2C:35-5b(2);

2. Knowingly or purposely distribute a controlled dangerous substance, that is, cocaine, in a quantity of less than one-half ounce, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3);

3. Knowingly or purposely distribute a controlled dangerous substance, that is, oxycodone, in a quantity of less than one ounce, including any adulterants or

dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5);

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)

KEVIN BROWN

AND

TYESHA ST-LOUIS

On or about December 22, 2020, at the city of Irvington, in the County of Essex, 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)

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, 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 FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, 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:35-10(a)(1) 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 - Second Degree)

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, 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:35-5b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

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

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, 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:35-5b(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

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

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, 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, in a quantity of less than one ounce, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5b(5) 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 with Intent to Distribute a Controlled Dangerous Substance within 1,000 Feet of School Property - Third Degree)

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin and/or cocaine and/or oxycodone, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of University Middle School which is owned by or leased to the Irvington 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 NINE

(Unlawful Possession of Assault Firearm - Second Degree)

KEVIN BROWN

And

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession an assault firearm, that is, a 5.56mm Palmetto Arms PA-15 semiautomatic rifle, serial number SCD121439, contrary to the provisions of N.J.S.A. 2C:39-5(f), and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Unlawful Possession of Assault Firearm - Second Degree)

KEVIN BROWN

And

TYESHA ST. LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession an assault firearm, that is, a .223 Panther Arms DPMS semiautomatic rifle, serial number F207470, contrary to the provisions of N.J.S.A. 2C:39-5(f), and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Possession of a Defaced Firearm - Fourth Degree)

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did have in their possession a prohibited weapon, that is, a .223 Panther Arms DPMS semiautomatic rifle with a defaced serial number, contrary to the provisions of N.J.S.A. 2C:39-3(d), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

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

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a .380 Smith & Wesson Bodyguard semiautomatic handgun, bearing serial number KDM6348, and/or a 5.56mm Palmetto Arms PA-15 semiautomatic rifle, bearing serial number SCD121439, and/or a .223 Panther Arms DPMS semiautomatic rifle, serial number F207470, while in the course of committing or attempting to commit a violation of N.J.S.A. 3C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1a 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 of a Large Capacity Ammunition Magazine - Fourth Degree)

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Money Laundering - Third Degree)

KEVIN BROWN

AND

TYESHA ST-LOUIS

on or about December 22, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, approximately \$3,780 in U.S. currency, known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Certain Persons not to Possess Firearms - Second Degree)

KEVIN BROWN

on or about December 22, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Possession with Intent to Distribute a Controlled Dangerous Substance on Essex County Indictment Number 19-01-00244-I, did purchase, own, possess, or control a firearm, that is, a .380 Smith & Wesson Bodyguard semiautomatic handgun, serial number KDM6348 and/or a 5.56 Palmetto Arms PA-15 semiautomatic rifle, serial number SCD121439, and/or .223 Panther Arms DPMS semiautomatic rifle, serial number F207470, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

AAG Veronica Allende
Director
Division of Criminal Justice

A TRUE BILL:

By:




Foreperson

SDAG Cynthia M. Vazquez
Division of Criminal Justice

Dated: 5-4-21

