FILED
April 26, 2021
STATE GRAND JURY JUDGE

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury
Number <u>SGJ754-21-7</u>
Superior Court
Docket Number **21-4-50-S**

STATE OF NEW JERSEY

INDICTMENT

V.

WAYNE BUSH

ROBERT ROWELL

and

)

KENYATTA HARPER

)

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

COUNT ONE

(Possession of a Controlled Dangerous Substance - Third Degree)

WAYNE BUSH

on or about February 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, fentanyl, 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 TWO

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

WAYNE BUSH

on or about February 24, 2021, at the City of Trenton, 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, fentanyl, a Schedule II narcotic drug, in a quantity of one ounce 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(4), N.J.S.A. 2C:35-5c, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Possession with Intent to Distribute a Controlled Dangerous Substance within 1000 Feet of School Property - Third Degree)

WAYNE BUSH

on or about February 24, 2021, at the City of Trenton, 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, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 1000 feet of the Washington Elementary School, which is owned or leased by the Trenton Board of Education, and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

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

KENYATTA HARPER

on or about February 24, 2021, at the City of Trenton, 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:39-3j, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

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

ROBERT ROWELL

on or about February 24, 2021, at the City of Trenton, 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:39-3j, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Certain Persons Not to Have Weapons - Second Degree)

ROBERT ROWELL

on or about February 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Third Degree Possession with Intent to Distribute a Controlled Dangerous Substance/Distribution of a Controlled Dangerous Substance within 1000 feet of School Property in Mercer County, on Indictment number MER010600772I; and/or having been convicted of the crime of Third Degree Possession with Intent to Distribute a Controlled Dangerous Substance/Distribution of a Controlled Dangerous Substance within 1000 feet of School Property in Mercer County, on Indictment number MER020600838I; and/or having been convicted of the crime of Third Degree Possession with Intent to Distribute a Controlled Dangerous/Distribution of a Controlled Dangerous Substance within 1000 feet of School Property in Mercer County, on Indictment number MER090200130I, did purchase, own, possess, or control the following firearm: a 9mm Luger caliber Taurus semi-automatic pistol, serial number TLX67881, 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

s/Cassandra Montalto
SDAG Cassandra Montalto BY: Deputy Chief Division of Criminal Justice

A TRUE BILL:

Deputy Foreperson

Dated: 4/26/21