

State Grand Jury
Number SGJ761-21-1
Superior Court
Docket Number 21-8-113-S

STATE OF NEW JERSEY)

v.)

MARVIN GOODWIN)

INDICTMENT

TERIKE GASS)

ARIKIA GOODWIN)

ANDRE ANDERSON)

JEROME BLAIR)

SHOMAHREE BROWN)

JAVON COOK)

STEVEN GODBOLT)

WILLIAM HERRINGTON)

BRIAN JOHNSON)

KENNETH MCKINNEY)

ERIC PENA)

JAKEEM RUTTER)

ANDRE WHITE)

and)

CHRISTOPHER YOUNGER)

.

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

COUNT ONE

(Racketeering - First Degree)

MARVIN GOODWIN

TERIKE GASS

ARIKIA GOODWIN

ANDRE ANDERSON

JEROME BLAIR

SHOMAHREE BROWN

JAVON COOK

STEVEN GODBOLT

WILLIAM HERRINGTON

BRIAN JOHNSON

KENNETH MCKINNEY

ERIC PENA

JAKEEM RUTTER

ANDRE WHITE

and

CHRISTOPHER YOUNGER

and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members of the 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 the enterprise engaged in the activities which affected trade or commerce, in that they:

1. Purposely or knowingly did conduct or participate directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, including the commission of crimes of the first degree, in violation of N.J.S.A. 2C:41-2c; or
2. With the purpose of promoting or facilitating the commission of the crime of racketeering, did agree that:
 - A. One or more of them would engage in conduct which would constitute the crime of racketeering; or
 - B. One or more of them would aid in the planning solicitation or commission of the crime of racketeering, that is to conduct or participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, including the commission of crimes of the first degree, in violation of N.J.S.A.

2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES AND PLACES

The predicate criminal activity occurred between on or about April 16, 2020, and on or about October 15, 2020, at the City of Paterson, in the County of Passaic, in the State of New Jersey, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

MARVIN GOODWIN, TERIKE GASS, ARIKIA GOODWIN, ANDRE ANDERSON, JEROME BLAIR, SHOMAHREE BROWN, JAVON COOK, STEVEN GODBOLT, WILLIAM HERRINGTON, BRIAN JOHNSON, KENNETH MCKINNEY, ERIC PENA, JAKHEEM RUTTER, CHRISTOPHER YOUNGER, ANDRE WHITE and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members or associates of the enterprise, but not as defendants herein, did constitute an "enterprise" within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, or associates thereof, which, among other names, members or associates thereof are known as 42-50, a set of the Crips Street Gang, engaged in, or the activities of which affected trade or commerce.

THE PURPOSES OF THE ENTERPRISE

At all times relevant to this Indictment, the 42-50 set of the

Crips Street Gang was a criminal enterprise operating in the area of the building located at 42-50 Auburn Street, which is situated on the corner of Auburn Street and Godwin Avenue in Paterson, New Jersey. The 42-50 set of the Crips Street Gang constitute an ongoing criminal enterprise whose members and associates function as a continuing unit for the common purpose of achieving the objectives of the enterprise. It was part of the conspiracy that the purposes of the enterprise would include the following:

- A. Collectively generating income on behalf of and for the benefit of the enterprise members and associates through violations of the laws of the State of New Jersey including the commission of the crimes of maintaining controlled dangerous substance production facilities and distribution of controlled dangerous substances;
- B. Accomplishing the goals of the enterprise through the collection of proceeds generated through the commission of various crimes from members of the enterprise, said proceeds to be utilized for the advancement and benefit of the enterprise and/or its leaders;
- C. Protecting the perpetuation of the enterprise by shielding its operation and existence of the enterprise from detection by law enforcement authorities by including but not limited to using areas difficult for

law enforcement to conduct surveillance due to connecting one-way streets, but using a desirable location that is easily accessible within Paterson by customers via major roads and highways, using a variety of locations, residences or motor vehicles for packaging, storage or delivery of controlled dangerous substances, which members and associates of the enterprise sold on behalf of the enterprise.

- D. Protecting the enterprise's drug distribution business territory and geographic territory from takeover by other gang factions and/or sets of the Crips Street Gang.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, consisted of at least two incidents of racketeering conduct by the enterprise during the relevant time, including Maintaining a Controlled Dangerous Substance Production Facility (N.J.S.A. 2C:35-4); Possession with Intent to Distribute Controlled Dangerous Substances (N.J.S.A. 2C:35-5); Distribution of Controlled Dangerous Substances (N.J.S.A. 2C:35-5); Distribution and/or Possession with Intent to Distribute Controlled Dangerous Substances within 1000 feet of School Property (N.J.S.A. 2C:35-7); Distribution and/or Possession with Intent to Distribute

Controlled Dangerous Substances within 500 feet of Public Property (N.J.S.A.2C:35-7.1); Money Laundering (N.J.S.A. 2C:21-25); and Conspiracy to commit these crimes (N.J.S.A.2C:5-2), as described herein and in Counts Three, Five, Seven, Eight, Nine, Eleven, Twelve, Thirteen, Fifteen, Sixteen, Seventeen, Nineteen, Twenty, Twenty-One, Twenty-Three, Twenty-Four, Twenty-Five, Twenty-Seven, Twenty-Eight, Twenty-Nine, Thirty-One, Thirty-Two, Thirty-Three, Thirty-Four, Thirty-Seven, Thirty-Eight, Thirty-Nine, Forty, Forty-One, Forty-Three, Forty-Four, Forty-Five, Forty-Eight, Fifty-One, Fifty-Two, Fifty-Three, Fifty-Six, Fifty-Seven, Fifty-Eight, Fifty-Nine, Sixty, Sixty-One, Sixty-Two, Sixty-Five, Sixty-Six, Sixty-Seven, Sixty-Eight, Seventy, Seventy-One, and Seventy-Two.

MARVIN GOODWIN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substances; and Maintaining a Controlled Dangerous Substance Production Facility which racketeering conduct is the subject of Count Three of this Indictment.

TERIKE GASS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; Distribution of a Controlled

Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance; and Money Laundering; which racketeering conduct is the subject of Counts Three, Eleven, Twelve, Thirteen, Thirty-Four, Thirty-Seven, Thirty-Eight, Thirty-Nine, Forty, Forty-One, Forty-Three, Forty-Four, Forty-Five, and Fifty-Nine of this Indictment.

ARIKIA GOODWIN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility, Distribution of a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance, and Money Laundering which racketeering conduct is the subject of Counts Three, Thirty-Four, Thirty-Seven, Thirty-Eight, Thirty-Nine, Forty, and Sixty-Two of this Indictment.

ANDRE ANDERSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; Distribution of a Controlled Dangerous Substance; and Possession with Intent to Distribute a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three, Forty-One, Forty-Three, Forty-Four, and Forty-Five of this Indictment.

JEROME BLAIR

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; and Distribution of a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three, Thirty-One, Thirty-Two, and Thirty-Three of this Indictment.

SHOMAHREE BROWN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; Distribution of a Controlled Dangerous Substance; and Possession with Intent to Distribute a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three, Sixty-Five, Sixty-Six, Sixty-Seven, and Sixty-Eight of this Indictment.

JAVON COOK

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; and Distribution of a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three, Nineteen, Twenty, and Twenty-One of this Indictment.

STEVEN GODBOLT

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; and Distribution of a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three, Seven, Eight, and Nine of this Indictment.

WILLIAM HERRINGTON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; Distribution of a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance; and Money Laundering; which racketeering conduct is the subject of Counts Three, Forty-Eight, Fifty-One, Fifty-Two, Fifty-Three, and Sixty-One of this Indictment.

BRIAN JOHNSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; Distribution of a Controlled Dangerous Substance; and Possession with Intent to Distribute a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three, Forty-One, Forty-Three, Forty-Four, and Forty-Five of this Indictment.

KENNETH MCKINNEY

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; and Distribution of a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three and Five of this Indictment.

ERIC PENA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; and Distribution of a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three, Twenty-Three, Twenty-Four, and Twenty-Five of this Indictment.

JAKEEM RUTTER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; Distribution of a Controlled Dangerous Substance; and Possession with intent to Distribute a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three, Eleven, Twelve, Thirteen, Fifteen, Sixteen, Seventeen, Seventy, Seventy-One, and Seventy-Two of this Indictment.

ANDRE WHITE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous

Substance Production Facility; Distribution of a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance; and Money Laundering; which racketeering conduct is the subject of Counts Three, Fifty-Six, Fifty-Seven, Fifty-Eight, and Sixty of this Indictment.

CHRISTOPHER YOUNGER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining a Controlled Dangerous Substance Production Facility; and Distribution of a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Three, Twenty-Seven, Twenty-Eight, and Twenty-Nine of this Indictment.

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

COUNT TWO

(Promoting Organized Street Crime - First Degree)

MARVIN GOODWIN

AND

TERIKE GASS

between on or about May 20, 2020, and on or about October 25, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier or manager, to commit one or more of the crimes enumerated in N.J.S.A. 2C:33-30, specifically, Distribution of a Controlled Dangerous Substance, and/or Possession with Intent to Distribute a Controlled Dangerous Substance, in violation of N.J.S.A. 2C:35-5a(1) and b, and Maintaining a Controlled Dangerous Substance Production Facility, in violation of N.J.S.A. 2C:35-4; contrary to the provisions of N.J.S.A. 2C:33-30, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Conspiracy - Second Degree)

MARVIN GOODWIN

TERIKE GASS

ARIKIA GOODWIN

ANDRE ANDERSON

JEROME BLAIR

SHOMAHREE BROWN

JAVON COOK

STEVEN GODBOLT

WILLIAM HERRINGTON

BRIAN JOHNSON

KENNETH MCKINNEY

ERIC PENA

JAKEEM RUTTER

ANDRE WHITE

and

CHRISTOPHER YOUNGER

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, between on or about April 16, 2020, and on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 and/or Maintaining or Operating a Controlled Dangerous Substance Production Facility, did agree that:

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

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

1. Knowingly or purposely distribute a controlled dangerous substance, that is, heroin, and/or 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) and N.J.S.A. 2C:35-5b(1);

2. Knowingly or purposely distribute a controlled dangerous substance, that is, fentanyl, 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) and N.J.S.A. 2C:35-5b(4);

3. Knowingly maintain or operate or knowingly participate in the maintenance or operations of a premises, place, or facility used for manufacturing controlled dangerous substances, that is, heroin and/or

cocaine and/or fentanyl, contrary to the provisions of
N.J.S.A. 2C:35-4.

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 FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

KENNETH MCKINNEY

on or about May 20, 2020, at the City of Paterson, in the County of Passaic, 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:35-10a(1) and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

KENNETH MCKINNEY

on or about May 20, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did 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 SIX

(Possession of a Controlled Dangerous Substance - Third Degree)

STEVEN GODBOLT

on or about May 20, 2020, at the City of Paterson, in the County of Passaic, 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:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

STEVEN GODBOLT

on or about May 20, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Distribution of a Controlled Dangerous Substance on or within
500 feet of a Public Property - Second Degree)

STEVEN GODBOLT

on or about May 20, 2020, at the City of Paterson, in the County
of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, heroin, in violation of N.J.S.A.
2C:35-5a, while within 500 feet of Martin Luther King Jr. Park,
a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a
and against the peace of this State, the government and dignity
of the same.

COUNT NINE

(Distribution of a Controlled Dangerous Substance within 1,000 Feet of School Property - Third Degree)

STEVEN GODBOLT

on or about May 20, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Paterson School 6, which is owned by or leased to the Paterson 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 TEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JAKEEM RUTTER

AND

TERIKE GASS

on or about June 12, 2020, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

JAKEEM RUTTER

AND

TERIKE GASS

on or about June 12, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, fentanyl, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Distribution of a Controlled Dangerous Substance on or within
500 feet of a Public Property - Second Degree)

JAKEEM RUTTER

AND

TERIKE GASS

on or about June 12, 2020, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, fentanyl, in violation of N.J.S.A.
2C:35-5a, while within 500 feet of Martin Luther King Jr. Park,
a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a
and N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same

COUNT THIRTEEN

(Distribution of a Controlled Dangerous Substance within 1,000 Feet of School Property - Third Degree)

JAKEEM RUTTER

AND

TERIKE GASS

on or about June 12, 2020, at the City of Paterson, in the County of Passaic, 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:35-5(a), while within 1,000 feet of Paterson School 6, which is owned by or leased to the Paterson 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 FOURTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JAKEEM RUTTER

on or about June 12, 2020, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

JAKEEM RUTTER

on or about June 12, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did 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 N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Distribution of a Controlled Dangerous Substance on or within
500 feet of a Public Property - Second Degree)

JAKEEM RUTTER

on or about June 12, 2020, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, cocaine, in violation of N.J.S.A.
2C:35-5a, while within 500 feet of Martin Luther King Jr. Park,
a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a
and N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same

COUNT SEVENTEEN

(Distribution of a Controlled Dangerous Substance within 1,000 Feet of School Property - Third Degree)

JAKEEM RUTTER

on or about June 12, 2020, at the City of Paterson, in the County of Passaic, 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 Paterson School 6, which is owned by or leased to the Paterson 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 EIGHTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JAVON COOK

on or about August 19, 2020, at the City of Paterson, in the County of Passaic, 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:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

JAVON COOK

on or about August 19, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Distribution of a Controlled Dangerous Substance on or within
500 feet of a Public Property - Second Degree)

JAVON COOK

on or about August 19, 2020, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, heroin, in violation of N.J.S.A.
2C:35-5a, while within 500 feet of Martin Luther King Jr. Park,
a public park, contrary to the provisions of N.J.S.A. 2C:35-
7.1a, and against the peace of this State, the government and
dignity of the same.

COUNT TWENTY-ONE

(Distribution of a Controlled Dangerous Substance within 1,000 Feet of School Property - Third Degree)

JAVON COOK

on or about August 19, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Paterson School 6, which is owned by or leased to the Paterson 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 TWENTY-TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

ERIC PENA

on or about August 19, 2020, at the City of Paterson, in the County of Passaic, 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:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Distribution of a Controlled Dangerous Substance - Third Degree)

ERIC PENA

on or about August 19, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Distribution of a Controlled Dangerous Substance on or within
500 feet of a Public Property - Second Degree)

ERIC PENA

on or about August 19, 2020, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, heroin, in violation of N.J.S.A.
2C:35-5a, while within 500 feet of Martin Luther King Jr. Park,
a public park, contrary to the provisions of N.J.S.A. 2C:35-
7.1a, and against the peace of this State, the government and
dignity of the same

COUNT TWENTY-FIVE

(Distribution of a Controlled Dangerous Substance within 1,000 Feet of School Property - Third Degree)

ERIC PENA

on or about August 19, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Paterson School 6, which is owned by or leased to the Paterson 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 TWENTY-SIX

(Possession of a Controlled Dangerous Substance - Third Degree)

CHRISTOPHER YOUNGER

on or about August 19, 2020, at the City of Paterson, in the County of Passaic, 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 TWENTY-SEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

CHRISTOPHER YOUNGER

on or about August 19, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, fentanyl, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Distribution of a Controlled Dangerous Substance on or within
500 feet of a Public Property - Second Degree)

CHRISTOPHER YOUNGER

on or about August 19, 2020, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, fentanyl, in violation of N.J.S.A.
2C:35-5a, while within 500 feet of Martin Luther King Jr. Park,
a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a
and N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT TWENTY-NINE

(Distribution of a Controlled Dangerous Substance within 1,000 Feet of School Property - Third Degree)

CHRISTOPHER YOUNGER

on or about August 19, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Paterson School 6, which is owned by or leased to the Paterson 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 THIRTY

(Possession of a Controlled Dangerous Substance - Third Degree)

JEROME BLAIR

between on or about August 21, 2020, and on or about August 27, 2020, at the City of Paterson, in the County of Passaic, 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:35-10a(1) and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Distribution of a Controlled Dangerous Substance - Third Degree)

JEROME BLAIR

between on or about August 21, 2020, and on or about August 27, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Distribution of a Controlled Dangerous Substance on or within
500 feet of a Public Property - Second Degree)

JEROME BLAIR

between on or about August 21, 2020, and on or about August 27,
2020, at the City of Paterson, in the County of Passaic,
elsewhere, and within the jurisdiction of this Court, knowingly
or purposely did distribute a controlled dangerous substance,
that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within
500 feet of Martin Luther King Jr. Park, a public park, contrary
to the provisions of N.J.S.A. 2C:35-7.1a, and against the peace
of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Distribution of a Controlled Dangerous Substance within 1,000 Feet of School Property - Third Degree)

JEROME BLAIR

between on or about August 21, 2020, and on or about August 27, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Paterson School 6, which is owned by or leased to the Paterson 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 THIRTY-FOUR

(Maintaining or Operating a Controlled Dangerous Substance
Facility - First Degree)

TERIKE GASS

AND

ARIKIA GOODWIN

between on or about August 10, 2020, and on or about September 2, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did maintain or operate or knowingly did participate in the maintenance or operations of a premises, place, or facility used for manufacturing controlled dangerous substances, that is, heroin and/or cocaine, contrary to the provisions of N.J.S.A. 2C:35-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Possession of a Controlled Dangerous Substance - Third Degree)

TERIKE GASS

AND

ARIKIA GOODWIN

on or about September 2, 2020, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Possession of a Controlled Dangerous Substance - Third Degree)

TERIKE GASS

AND

ARIKIA GOODWIN

on or about September 2, 2020, at the City of Paterson, in the County of Passaic, 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:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SEVEN

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

TERIKE GASS

AND

ARIKIA GOODWIN

on or about September 2, 2020, at the City of Paterson, in the County of Passaic, 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 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), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-EIGHT

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

TERIKE GASS

AND

ARIKIA GOODWIN

on or about September 2, 2020, at the City of Paterson, in the County of Passaic, 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:35-5a(1), 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 THIRTY-NINE

(Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property - Second Degree)

TERIKE GASS

AND

ARIKIA GOODWIN

on or about September 2, 2020, at the City of Paterson, in the County of Passaic, 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, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Martin Luther King Jr. Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

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

TERIKE GASS

AND

ARIKIA GOODWIN

on or about September 2, 2020, at the City of Paterson, in the County of Passaic, 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, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Paterson School 6, which is owned by or leased to the Paterson 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 FORTY-ONE

(Maintaining or Operating a Controlled Dangerous Substance
Facility - First Degree)

TERIKE GASS

ANDRE ANDERSON

AND

BRIAN JOHNSON

on or about October 15, 2020, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly did maintain or operate or knowingly did
participate in the maintenance or operations of a premises, place,
or facility used for manufacturing controlled dangerous
substances, that is, cocaine, contrary to the provisions of
N.J.S.A. 2C:35-4 and N.J.S.A. 2C:2-6, and against the peace of
this State, the government and dignity of the same.

COUNT FORTY-TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

TERIKE GASS

ANDRE ANDERSON

AND

BRIAN JOHNSON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-THREE

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

TERIKE GASS

ANDRE ANDERSON

AND

BRIAN JOHNSON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 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) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FOUR

(Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property - Second Degree)

TERIKE GASS

ANDRE ANDERSON

AND

BRIAN JOHNSON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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:35-5a, while within 500 feet of Roberto Clemente Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same

COUNT FORTY-FIVE

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

TERIKE GASS

ANDRE ANDERSON

AND

BRIAN JOHNSON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 Paterson School 11, which is owned by or leased to the Paterson 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 FORTY-SIX

(Tampering or Fabricating of Physical Evidence - Fourth Degree)

ANDRE ANDERSON

AND

BRIAN JOHNSON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did believe that an official proceeding or investigation was pending or about to be instituted knowingly and purposely did attempt to conceal Controlled Dangerous Substances, with the purpose of impairing its verity or availability in the proceeding or investigation, contrary to the provisions of N.J.S.A. 2C:28-6 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SEVEN

(Hindering Apprehension - Third Degree)

ANDRE ANDERSON

AND

BRIAN JOHNSON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, with the purpose to hinder the apprehension, prosecution, conviction or punishment of himself or another person, did suppress, by way of concealment or destruction, any evidence of the crimes of Possession of a Controlled Dangerous Substance and/or Possession of a Controlled Dangerous Substance with Intent to Distribute or tampered with a witness, informant, document or other source of information, regardless of its admissibility in evidence, which might aid in their discovery or apprehension of such person or in the lodging of a charge against him, contrary to the provisions of N.J.S.A. 2C:29-3a(3), N.J.S.A. 2C:29-3b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-EIGHT

(Maintaining or Operating a Controlled Dangerous Substance
Facility - First Degree)

WILLIAM HERRINGTON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did maintain or operate or knowingly did participate in the maintenance or operations of a premises, place, or facility used for manufacturing controlled dangerous substances, that is, heroin and/or cocaine, contrary to the provisions of N.J.S.A. 2C:35-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTY-NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

WILLIAM HERRINGTON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 FIFTY

(Possession of a Controlled Dangerous Substance - Third Degree)

WILLIAM HERRINGTON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-ONE

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

WILLIAM HERRINGTON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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), and N.J.S.A. 2C:35-5b(2), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-TWO

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

WILLIAM HERRINGTON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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:35-5a(1) and N.J.S.A. 2C:35-5b(2), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-THREE

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

WILLIAM HERRINGTON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine and/or heroin, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Our Lady of Lourdes School, which is owned by or leased to the Dioceses of Paterson Catholic Schools 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 FIFTY-FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

ANDRE WHITE

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 FIFTY-FIVE

(Possession of a Controlled Dangerous Substance - Third Degree)

ANDRE WHITE

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SIX

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

ANDRE WHITE

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 five ounces or more, 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(1), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SEVEN

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

ANDRE WHITE

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 five ounces or more, 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(1), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-EIGHT

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

ANDRE WHITE

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine and/or heroin, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Paterson School 1, which is owned by or leased to the Paterson 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 FIFTY-NINE

(Money Laundering - Third Degree)

TERIKE GASS

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 \$52,063 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25a, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY

(Money Laundering - Third Degree)

ANDRE WHITE

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 \$45,527 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25a, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-ONE

(Money Laundering - Third Degree)

WILLIAM HERRINGTON

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 \$2,000 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25a, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-TWO

(Money Laundering - Third Degree)

ARIKIA GOODWIN

on or about September 2, 2020, at the City of Paterson, in the County of Passaic, 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 \$1,375 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25a, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

SHOMAHREE BROWN

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

SHOMAHREE BROWN

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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 SIXTY-FIVE

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

SHOMAHREE BROWN

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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), and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-SIX

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

SHOMAHREE BROWN

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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), and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-SEVEN

(Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property - Second Degree)

SHOMAHREE BROWN

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, 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, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Martin Luther King Jr. Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a, and against the peace of this State, the government and dignity of the same

COUNT SIXTY-EIGHT

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

SHOMAHREE BROWN

on or about October 15, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine and/or heroin, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Paterson School 6, which is owned by or leased to the Paterson 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 SIXTY-NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

JAKEEM RUTTER

on or about January 14, 2021, at the City of Paterson, in the County of Passaic, 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 SEVENTY

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

JAKEEM RUTTER

on or about January 14, 2021, at the City of Paterson, in the County of Passaic, 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 a quantity one ounce or more, 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(4), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-ONE

(Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property - Second Degree)

JAKEEM RUTTER

on or about January 14, 2021, at the City of Paterson, in the County of Passaic,, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, fentanyl, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of Martin Luther King Jr. Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a, and against the peace of this State, the government and dignity of the same

COUNT
SEVENTY-
TWO

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

JAKEEM
RUTTER

on or about January 14, 2021, at the City of Paterson, in
the County of Passaic, elsewhere, and within the
jurisdiction of this Court, knowingly or purposely did
possess with intent to distribute a narcotic drug, that is,
fentanyl, in violation of N.J.S.A. 2C:35- 5(a), while within
1,000 feet of Paterson School 6, which is owned by or leased
to the Paterson 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.

A TRUE BILL:



AAG Lyndsay V.
Ruotolo
DIRECTOR
DIVISION OF CRIMINAL
JUSTICE

Foreperson [REDACTED]

Dated: 8/11/2021