FILED March 22, 2021 STATE GRAND JURY JUDGE

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL State Grand Jury Number <u>SGJ749-21-9</u> Superior Court Docket Number <u>2</u>1-3-30-S STATE OF NEW JERSEY) v.) INDICTMENT JOY SCOTT)

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) JOY SCOTT

between on or about January 3, 2019, and on or about August 1, 2019, 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, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of <u>N.J.S.A.</u> 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

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COUNT TWO

(Distribution of a Controlled Dangerous Substance - Second Degree)

JOY SCOTT

between on or about January 3, 2019, and on or about January 11, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did 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 <u>N.J.S.A.</u> 2C:35-5a(1), <u>N.J.S.A.</u> 2C:35-5b(2), <u>N.J.S.A.</u> 2C:35-5c, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Distribution of A Controlled Dangerous Substance Within 1000 Feet of School Property - Third Degree)

JOY SCOTT

between on or about January 3, 2019, and on or about January 11, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of <u>N.J.S.A.</u> 2C:35-5a, while within 1000 feet of Mott Elementary School, which is owned by or leased to the Trenton Board of Education and used for school purposes, contrary to the provisions of <u>N.J.S.A.</u>2C:35-7, and against the peace of this State, the government and dignity of the same

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COUNT FOUR

(Distribution of a Controlled Dangerous Substance within 500 Feet of Certain Public Property - Second Degree)

JOY SCOTT

between on or about January 3, 2019, and on or about January 11, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of <u>N.J.S.A.</u> 2C:35-5a, while within 500 feet of 3rd Street Park, a public park, contrary to the provisions of <u>N.J.S.A.</u> 2C:35-7.1a, 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 - Third Degree)

JOY SCOTT

on or about August 1, 2019, 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, heroin, contrary to the provisions of <u>N.J.S.A.</u> 2C:35-5a(1), <u>N.J.S.A.</u> 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Unlawful Possession of an Assault Firearm - Second Degree)

JOY SCOTT

on or about August 1, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did have in her possession an assault firearm, that is, a 7.62x39mm caliber Century International Arms Inc. semi-automatic pistol, serial number AKMP00224, contrary to the provisions of <u>N.J.S.A.</u> 2C:39-5f, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Unlawful Possession of a Weapon - Second Degree)

JOY SCOTT

on or about August 1, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 40 S&W caliber Glock semiautomatic pistol, serial number RYL724, without having first obtained a permit to carry same as provided in <u>N.J.S.A.</u> 2C:58-4, contrary to the provisions of <u>N.J.S.A.</u> 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Possession of Hollow Nose Bullets - Fourth Degree)

JOY SCOTT

on or about August 1, 2019, at the City of Trenton, 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 <u>N.J.S.A.</u> 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)

JOY SCOTT

on or about August 1, 2019, 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 <u>N.J.S.A.</u> 2C:39-3j, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Endangering Welfare of Children - Second Degree)

JOY SCOTT

between on or about January 3, 2019, and on or about August 1, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, having a legal duty for the care of, or having assumed responsibility for the care of A.A., date of birth 12/7/2011, A.A., date of birth 7/25/2016, and A.A., date of birth 1/6/2019, knowingly did cause harm to A.A., A.A., and A.A., making A.A., A.A., and A.A. abused or neglected children as defined in <u>N.J.S.A.</u> 9:6-1, <u>N.J.S.A.</u> 9:6-3, and <u>N.J.S.A.</u> 9:6-8.21, contrary to the provisions of <u>N.J.S.A.</u> 2C:24-4a, and against the peace of this State, the government and dignity of the same.

> AAG Veronica Allende DIRECTOR DIVISION OF CRIMINAL JUSTICE

BY: SDAG Cassandra Montalto Division of Criminal Justice

A TRUE BILL:

Deputy Foreperson Date: <u>3/22/2021</u>