

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL
State Grand Jury
Number SGJ752-21-12
Superior Court
Docket Number 21-4-58-S

STATE OF NEW JERSEY)
v.)
NADIR ROBERTS)
TIYANN BUNN)
NATHANIAL JACKSON)
QUADIR ROBERTS)
NAZIR HEYWARD)
AND)
DEANDRE MARTINEZ)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

NADIR ROBERTS
TIYANN BUNN
NATHANIAL JACKSON
QUADIR ROBERTS
AND
NAZIR HEYWARD

who are named as defendants herein, and other persons whose identities are unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about February 1, 2020, and on or about August 17, 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 crime of Maintaining or Operating a Controlled Dangerous Substance Production Facility and/or Distribution of a Controlled Dangerous Substance, did agree that:

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

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

1. Knowingly did maintain or operate or knowingly did participate in the maintenance or operation of a premise, place or facility used for manufacturing a controlled dangerous substance, that is, heroin and/or cocaine, contrary to the provisions of N.J.S.A. 2C:35-4;

2. 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), N.J.S.A. 2C:35-5b(1),

3. Knowingly or purposely distribute a controlled dangerous substance, that is, marijuana, 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(11).

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

(Promoting Organized Street Crime - First Degree)

NADIR ROBERTS

between on or about February 1, 2020, and on or about August 17, 2020, at the city of Irvington, in the County of Essex, 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/or, Maintaining or Operating 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

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

NADIR ROBERTS

TIYANN BUNN

NATHANIAL JACKSON

AND

QUADIR ROBERTS

between on or about February 1, 2020, and on or about August 17, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did maintain or operate or knowingly did participate in the maintenance or operation of a premise, place, or facility used for manufacturing a controlled dangerous substance, 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 FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

NADIR ROBERTS

NATHANIAL JACKSON

AND

QUADIR ROBERTS

on or about August 17, 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:35-10a(1) and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Possession of a Controlled Dangerous Substance - Third Degree)

NADIR ROBERTS

NATHANIAL JACKSON

AND

QUADIR ROBERTS

on or about August 17, 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:35-10a(1) and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Possession of a Controlled Dangerous Substance - Third Degree)

NADIR ROBERTS

NATHANIAL JACKSON

AND

QUADIR ROBERTS

on or about August 17, 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, crack cocaine, 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

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

NADIR ROBERTS

NATHANIAL JACKSON

AND

QUADIR ROBERTS

on or about August 17, 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, 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 EIGHT

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

NADIR ROBERTS

NATHANIAL JACKSON

AND

QUADIR ROBERTS

on or about August 17, 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, 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 NINE

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

NADIR ROBERTS

NATHANIAL JACKSON

AND

QUADIR ROBERTS

on or about August 17, 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, crack 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 TEN

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

NADIR ROBERTS

NATHANIAL JACKSON

AND

QUADIR ROBERTS

on or about August 17, 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, marijuana, in a quantity of one ounce or more but less than five pounds, 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(11) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Money Laundering - Third Degree)

NADIR ROBERTS

NATHANIEL JACKSON

AND

QUADIR ROBERTS

on or about August 17, 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 \$13,372 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:21-25a and N.J.S.A. 2C:2-6, 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)

NADIR ROBERTS

NATHANIAL JACKSON

AND

QUADIR ROBERTS

on or about August 17, 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 black and silver Smith and Wesson 38 caliber revolver, bearing serial number CEN2685, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT THIRTEEN

(Resisting Arrest - Fourth Degree)

NADIR ROBERTS

AND

NATHANIAL JACKSON

on or about August 17, 2020, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely prevented Detective Andre Crayton, a law enforcement officer of the New Jersey State Police from effecting a lawful arrest by flight, contrary to the provisions of N.J.S.A. 2C:29-2(a)(2), and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

NADIR ROBERTS

AND

NATHANIAL JACKSON

on or about August 17, 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:35-10a(1) and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

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

NADIR ROBERTS

AND

NATHANIAL JACKSON

on or about August 17, 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, 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

(Possession of a Controlled Dangerous Substance - Third Degree)

NADIR ROBERTS

TIYANN BUNN

AND

NAZIR HEYWARD

on or about August 17, 2020, at the city of Newark, 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:35-10a(1) and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

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

NADIR ROBERTS

TIYANN BUNN

AND

NAZIR HEYWARD

on or about August 17, 2020, at the city of Newark, 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,
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 EIGHTEEN

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

NADIR ROBERTS

TIYANN BUNN

AND

NAZIR HEYWARD

on or about August 17, 2020, at the city of Newark, 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, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the Thirteenth Avenue School and/or KIPP Newark Collegiate Academy which is owned by or leased to the Newark Board of Education and/or KIPP Collegiate Academy 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 NINETEEN

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

NADIR ROBERTS

TIYANN BUNN

AND

NAZIR HEYWARD

on or about August 17, 2020, at the city of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is a black Beretta PX4 Storm bearing serial number PX0927U, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT TWENTY

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

NADIR ROBERTS

AND

TIYANN BUNN

on or about August 17, 2020, at the city of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is a black Glock 19 bearing serial number AXG818, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT TWENTY-ONE

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

NADIR ROBERTS

AND

TIYANN BUNN

on or about August 17, 2020, at the city of Newark, 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:39-3j and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT TWENTY-TWO

(Money Laundering - Third Degree)

NADIR ROBERTS

AND

TIYANN BUNN

on or about August 17, 2020, at the city of Newark, 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 \$8,952 in U.S. currency, 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 TWENTY-THREE

(Endangering the Welfare of a Child - Second Degree)

NADIR ROBERTS

AND

TIYANN BUNN

between on or about February 1, 2020, and on or about August 17, 2020, at the city of Newark, at the city of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, having a legal duty for the care of, or having assumed responsibility for the care of N.B., born November 1, 2018, knowingly did cause harm to N.B., making N.B. an abused or neglected child as defined in R.S. 9:6-1, R.S. 9:6-3 and P.L. 1974, c. 119, s.1, (C. 9:6-8:21), contrary to the provisions of N.J.S.A. 2C:24-4a, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Hindering Apprehension - Third Degree)

DEANDRE MARTINEZ

between on or about August 25, 2020, and on or about October 9, 2020, at the city of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to hinder the apprehension, prosecution, conviction or punishment of another person, that is, Nadir Roberts, Tiyan Bunn and/or Nathaniel Jackson, did give false information to a law enforcement officer, contrary to the provisions of N.J.S.A. 2C:29-3a(7), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Possession of a Weapon by a Convicted Person - Second Degree)

NADIR ROBERTS

on or about August 17, 2020, at the city of Newark, 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 Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on Essex County Indictment 06-04-01264-I, and/or the crime of Prohibited Weapons/Devices on Essex County Indictment 06-04-01264-I and/or the crime of Possession of Certain Bullets on Essex County Indictment 06-04-01264-I and/or the crime of Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on Essex County Indictment 06-05-01535-I and/or the crime of Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance on Essex County Indictment 06-05-01535-I and/or the crime of Distribution and/or Possession with Intent to Distribute a Controlled Dangerous Substance within 1,000 feet of School Property on Essex County Indictment 07-06-02251-I, did purchase, own, possess or control a firearm, that is, a black Glock 19 bearing serial number AXG818 and/or a black and silver Smith and Wesson 38 caliber revolver, bearing serial number CEN2685 and/or a black Beretta PX4 Storm bearing serial number PX0927U, 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.

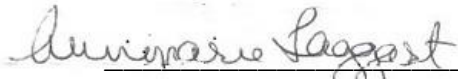
AAG Veronica Allende
Director
Division of Criminal Justice

A TRUE BILL:

By:



Foreperson



AAG Annmarie Taggart
Deputy Director
Division of Criminal Justice

Dated: 4-30-21