

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ753-21-2
Superior Court
Docket Number 21-4-46-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

CHARLES M. WILLIS)

and)

DAYSHA BROWN)

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

COUNT ONE

(Possession of a Defaced Firearm - Fourth Degree)

CHARLES M. WILLIS

and

DAYSHA BROWN

on or about June 2, 2020, at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did possess a prohibited weapon, that is, a 9mm luger caliber Glock semi-automatic pistol with a defaced serial number, contrary to the provisions of N.J.S.A. 2C:39-3d, and against the peace of this State, the government and dignity of the same.

COUNT TWO

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

CHARLES M. WILLIS

and

DAYSHA BROWN

on or about June 2, 2020, at the Township of Willingboro, in the County of Burlington, 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 THREE

(Endangering Welfare of Children - Second Degree)

CHARLES M. WILLIS

and

DAYSHA BROWN

on or about June 2, 2020, at the Township of Willingboro, in the County of Burlington, 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.W., date of birth 3/26/2018, knowingly did cause harm to N.W., making N.W. an abused or neglected child as defined in N.J.S.A. 9:6-1, N.J.S.A. 9:6-3, and N.J.S.A. 9:6-8.21, contrary to the provisions of N.J.S.A. 2C:24-4a(2), N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

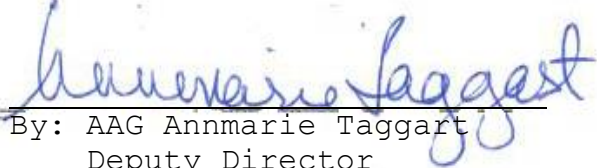
COUNT FOUR

(Certain Persons Not to Have Weapons - Second Degree)

CHARLES M. WILLIS

on or about June 2, 2020, at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Second Degree Unlawful Possession of a Weapon in Mercer County, on Indictment number MER120300270I; and/or Second Degree Unlawful Possession of a Weapon in Mercer County, on Indictment number MER130400421I; did purchase, own, possess, or control the following firearm: a 9mm luger caliber Glock semi-automatic pistol, serial number BGRM668, 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


By: AAG Annmarie Taggart
Deputy Director
Division of Criminal Justice

A TRUE BILL:

Foreperson

Date: 4/22/2021