

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ778-22-14-S

Superior Court

Docket Number 22-10-136-S

STATE OF NEW JERSEY

)

SUPERSEDING INDICTMENT

v.

)

TRAVIS THOMAS

)

MARQUETTA WILSON

)

WILLIAM THOMAS

)

YAQUIN PERRY

)

TYQUAN EVANS

)

KAMAR WALKER

)

KYZIEK MCCASKILL

)

KARIE WASHINGTON

)

NEILZHON WILLIAMS

)

KYEEM DOWELL

)

JAQUON MCCOY

)

CHRISTOPHER JOHNSON

)

DONTREL SCOTT

)

RALPH ERVIN

)

and

)

VINSON ERVIN

)

The Grand Jurors of and for the State of New Jersey, upon

their oaths, present that:

COUNT ONE

(Racketeering - First Degree)

TRAVIS THOMAS

MARQUETTA WILSON

WILLIAM THOMAS

YAQUIN PERRY

TYQUAN EVANS

KAMAR WALKER

KYZIEK MCCASKILL

KARIE WASHINGTON

NEILZHON WILLIAMS

KYEEM DOWELL

JAQUON MCCOY

CHRISTOPHER JOHNSON

DONTREL SCOTT

RALPH ERVIN

and

VINSON ERVIN

and other persons whose identities are known and unknown to the Grand Jurors, who are named as a 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 an 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 a crime 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 a crime 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 December 12, 2018, and on or about December 10, 2021, at the City of Paterson, in the County of Passaic, at the Borough of East Rutherford, in the County of Bergen, in the State of South Carolina, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

TRAVIS THOMAS, MARQUETTA WILSON, YAQUIN PERRY, TYQUAN EVANS, KAMAR WALKER, KYZIEK MCCASKILL, WILLIAM THOMAS, KARIE WASHINGTON, NEILZHON WILLIAMS, KYEEM DOWELL, JAQUON MCCOY, CHRISTOPHER JOHNSON, DONTREL SCOTT, RALPH ERVIN, and VINSON ERVIN, and other persons whose identities are known and unknown to the Grand Jurors, who are named as a 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 engaged in, or the activities of which affected trade or commerce.

THE PURPOSES OF THE ENTERPRISE

At all times relevant to this Indictment, the group of individuals associated in fact and associates thereof were a criminal enterprise operating out of Paterson, New Jersey, other areas in Passaic County and Bergen County, and the State of South Carolina. The group of individuals associated in fact and associates thereof 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 transporting firearms into the State for an unlawful sale or transfer; manufacture, transport, or disposition of firearms; and leader of a firearms trafficking network;

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 members and leaders and for the perpetuation of the enterprise;

C. Protecting the perpetuation of the enterprise by shielding its operation from detection by law enforcement authorities by, among other things, concealing the means and locations from which it conducts its affairs, using wireless telephones and social media, obtaining firearms from illegal or unregulated sources, and using a variety of locations or residences for storage or delivery of firearms.

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 Leader of a Firearms Trafficking Network (N.J.S.A. 2C:39-16), Transporting Firearms Into the State for an Unlawful Sale or Transfer (N.J.S.A. 2C:39-9i), Manufacture, Transport, Disposition of a Firearm (N.J.S.A. 2C:39-9d), Manufacture, Transport, Disposition of an

Assault Firearm (N.J.S.A. 2C:39-9g), and Conspiracy to commit these crimes (N.J.S.A. 2C:5-2), as described herein and in Counts Two, Three, Four, Six, Nine, Eleven, Fourteen, Fifteen, Seventeen, Twenty, Twenty-Six, and Twenty-Eight.

TRAVIS THOMAS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Leader of a Firearms Trafficking Network; Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, and Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of Counts Two, Three, Four, Six, Nine, Eleven, Fourteen, Seventeen, Twenty, and Twenty-Six, and Twenty-Eight of this Indictment.

MARQUETTA WILSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of Counts Two, Three, Six, Eleven, and Twenty of this Indictment.

WILLIAM THOMAS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport,

Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of Counts Two, Three, and Six of this Indictment.

YAQUIN PERRY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of Counts Two, Three, Six, Twenty-Six, and Twenty-Eight of this Indictment.

TYQUAN EVANS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; which racketeering conduct is the subject of Counts Two and Six of this Indictment.

KAMAR WALKER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of

Counts Two, Three, Six, Nine, and Fifteen of this Indictment.

KYZIEK MCCASKILL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of Counts Two, Tree, and Six of this Indictment.

KARIE WASHINGTON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of Counts Two, Three, and Six of this Indictment.

NEILZHON WILLIAMS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; which racketeering conduct is the subject of Counts Two, Six, and Seventeen of this Indictment.

KYEEM DOWELL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State

for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of Counts Two and Three of this Indictment.

JAQUON MCCOY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of Counts Two, Three, and Six of this Indictment.

CHRISTOPHER JOHNSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; Manufacture, Transport, Disposition of an Assault Firearm; which racketeering conduct is the subject of Counts Two, Three, and Six of this Indictment.

DONTREL SCOTT

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; which racketeering conduct is the subject of Counts Two and Six of this Indictment.

RALPH ERVIN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; which racketeering conduct is the subject of Counts Two and Six of this Indictment.

VINSON ERVIN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Transporting Firearms Into the State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; which racketeering conduct is the subject of Counts Two and Six 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

(Conspiracy - Second Degree)

TRAVIS THOMAS

YAQUIN PERRY

MARQUETTA WILSON

WILLIAM THOMAS

TYQUAN EVANS

KAMAR WALKER

KYZIEK MCCASKILL

KARIE WASHINGTON

NEILZHON WILLIAMS

KYEEM DOWELL

JAQUON MCCOY

CHRISTOPHER JOHNSON

DONTREL SCOTT

RALPH ERVIN

and

VINSON ERVIN

who are named as defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as a co-conspirators but not as defendants herein, between on or about December 12, 2018, and on or about December 10, 2021, at the City of Paterson, in the County of Passaic, at the Borough of East Rutherford, in the County of Bergen, in the State of South

Carolina, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Transporting a Firearm into this State for an Unlawful Sale or Transfer; Manufacture, Transport, Disposition of a Firearm; and Manufacture, Transport, Disposition of a Large Capacity Ammunition Magazine; did agree together, and with a person whose identity is unknown to the Grand Jurors, who at all times relevant to this indictment was an agent of the New Jersey State Police, that:

1. One or more of them would engage in conduct which would constitute the aforesaid crime, or

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

A. Knowingly or purposely transport, ship, or otherwise bring into this State any firearm for the purpose of unlawfully selling, transferring, giving, assigning, or disposing of that firearm to another individual, contrary to the provisions of N.J.S.A. 2C:39-9i.

B. Knowingly transport, ship, sell, or dispose of a firearm without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d.

C. Knowingly transport, ship, sell, or dispose of a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-9h.

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 THREE

(Conspiracy - Third Degree)

TRAVIS THOMAS

YAQUIN PERRY

MARQUETTA WILSON

WILLIAM THOMAS

KAMAR WALKER

KYZIEK MCCASKILL

KARIE WASHINGTON

KYEEM DOWELL

JAQUON MCCOY

and

CHRISTOPHER JOHNSON

who are named as defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as a co-conspirators but not as defendants herein, between on or about March 27, 2019, and on or about December 10, 2021, at the City of Paterson, in the County of Passaic, at the Borough of East Rutherford, in the County of Bergen, in the State of South Carolina, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of Manufacture, Transport, Disposition, of an Assault Firearm, did agree together that:

1. One or more of them would engage in conduct which would constitute the aforesaid crime, or

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

A. Knowingly transport, ship, sell, or dispose of an assault firearm, without being licensed or registered to do so pursuant to N.J.S.A. 2C:58-1 et. seq., contrary to the provisions of N.J.S.A. 2C:39-9g.

OVERT ACTS

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following OVERT ACTS, among others were committed:

1. On or about March 27, 2019, Travis Thomas sent Karie Washington a photograph of two AR-15 assault rifles that Thomas had for sale for \$3000. Washington agreed to try and find buyers for the assault rifles.

2. On or about March 30, 2019, Travis Thomas contacted Karie Washington and told Washington that Washington's buyers had to confirm whether they wanted to buy the AR-15 assault rifles that day or Thomas would sell them to other individuals.

3. On or about April 3, 2019, Travis Thomas contacted Kamar Walker and instructed Walker to tell his buyer that Thomas was selling an AR-15 assault firearm for \$900, and Walker agreed to

inform his buyer.

4. On or about October 11, 2020, Kamar Walker asked Travis Thomas what type of weapon he had for sale, and Thomas informed Walker he had a 40 caliber AR assault weapon available for \$700. Walker agreed he wanted to purchase the assault firearm from Thomas.

5. On or about August 30, 2021, Travis Thomas sent Marquette Wilson a photograph of an AR-15 assault rifle, which Wilson sent to Kyeem Dowell. Dowell asked Wilson for the price of the assault weapon, she indicated the cost was \$2200, and Dowell responded with a thumbs up emoji.

6. On or about October 13, 2021, Travis Thomas contacted Christopher Johnson in South Carolina and told Johnson to bring him an AR assault firearm for \$600. Johnson agreed to bring the firearm to Thomas.

7. On or about December 8, 2021, Jaquon McCoy contacted Travis Thomas and told Thomas he had an AR-15 assault firearm to sell Thomas for \$400. Thomas agreed to purchase the gun.

8. On or about December 8, 2021, Travis Thomas obtained the AR-15 assault firearm from Jaquon McCoy in South Carolina, and then took pictures of the firearm for the purposes of selling the firearm in Paterson, New Jersey.

9. Between on or about December 8, 2021, and on or about

December 10, 2021, Travis Thomas offered the AR-15 assault weapon for \$2,200 to Yaquin Perry, William Thomas, Karie Washington, and Kyzeik McCaskill.

10. On or about December 9, 2021, Travis Thomas contacted Kyzeik McCaskill and asked if McCaskill wanted the AR-15 assault firearm, and McCaskill informed Thomas he was trying to find a buyer.

11. On or about December 10, 2021, Travis Thomas contacted Yaquin Perry and sent him another picture of the AR-15 assault weapon, and Perry confirmed that Thomas intended to come to Perry's house to sell the weapon.

12. On or about December 10, 2021, the day Travis Thomas was arrested, W. Thomas sent a picture of the AR-15 assault weapon, which was found on Travis Thomas, to another individual along with the prices. W. Thomas stated that the price is \$2,300, but if he told Thomas that it was for him (W. Thomas), he could probably sell it for \$2,000.

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

(Leader of a Firearms Trafficking Network - First Degree)

TRAVIS THOMAS

between on or about December 12, 2018, and on or about December 10, 2021, at the City of Paterson, in the County of Passaic, at the Borough of East Rutherford, in the County of Bergen, in the State of South Carolina, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier or manager of at least two other persons, to engage for profit in a scheme or course of conduct to unlawfully manufacture, distribute, transport, ship, sell, or dispose of any firearm, contrary to the provisions of N.J.S.A. 2C:39-16, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Promoting Organized Street Crime - First Degree)

TRAVIS THOMAS

between on or about December 12, 2018, and on or about December 10, 2021, at the City of Paterson, in the County of Passaic, at the Borough of East Rutherford, in the County of Bergen, 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, Possession of a Prohibited Weapon, in violation of N.J.S.A. 2C:39-3j; Unlawful Possession of a Weapon, in violation N.J.S.A. 2C:39-5b; Unlawful Possession of an Assault Firearm, in violation of N.J.S.A. 2C:39-5f; Manufacture, Manufacture, Transport, Disposition of a Firearm, in violation of N.J.S.A. 2C:39-9d; Manufacture, Transport, Disposition, of an Assault Firearm, in violation of N.J.S.A. 2C:39-9g; Manufacture, Transport, Disposition of a Large Capacity Ammunition Magazine, in violation of N.J.S.A. 2C:39-9h; and Transporting a Firearm into this State for an Unlawful Sale or Transfer, in violation N.J.S.A. 2C:39-9i; 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 SIX

(Transporting Firearms into the State for an
Unlawful Sale or Transfer - Second Degree)

TRAVIS THOMAS

YAQUIN PERRY

MARQUETTA WILSON

WILLIAM THOMAS

TYQUAN EVANS

KAMAR WALKER

KYZIEK MCCASKILL

KARIE WASHINGTON

NEILZHON WILLIAMS

JAQUON MCCOY

CHRISTOPHER JOHNSON

DONTREL SCOTT

RALPH ERVIN

and

VINSON ERVIN

between on or about September 25, 2020, and on or about December
10, 2021, at the City of Paterson, in the County of Passaic, at
the Borough of East Rutherford, in the County of Bergen, in the
State of South Carolina, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did transport, ship, or
otherwise bring into this State any firearm for the purpose of

unlawfully selling, transferring, giving, assigning, or disposing of that firearm to another individual, contrary to N.J.S.A. 2C:39-9i, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Unlawful Possession of a Weapon - Second Degree)

TRAVIS THOMAS

on or about September 28, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Smith & Wesson, Model SD9VE, semiautomatic pistol, serial number FZK2994, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Unlawful Possession of a Weapon - Second Degree)

KAMAR WALKER

between on or about September 28, 2020, and on or about October 14, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Smith & Wesson, Model SD9VE, semiautomatic pistol, serial number FZK2994, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Manufacture, Transport, Disposition
of a Weapon - Fourth Degree)

TRAVIS THOMAS

and

KAMAR WALKER

between on or about September 28, 2020, and on or about October 14, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a 9mm Smith & Wesson, Model SD9VE, semiautomatic pistol, serial number FZK2994, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Unlawful Possession of a Weapon - Second Degree)

TRAVIS THOMAS

between on or about July 1, 2021, and on or about July 8, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Hi-Point semi-automatic pistol, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Manufacture, Transport, Disposition
of a Weapon - Fourth Degree)

TRAVIS THOMAS

and

MARQUETTA WILSON

between on or about July 2, 2021, and on or about July 15, 2021,
at the City of Paterson, in the County of Passaic, elsewhere, and
within the jurisdiction of this Court, knowingly did transport,
ship, sell, or dispose of a firearm, that is, a 9mm High-Point
semi-automatic pistol, without being licensed or registered to do
so as provided in chapter 58, contrary to the provisions of
N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this
State, the government and dignity of the same.

COUNT TWELVE

(Unlawful Possession of a Weapon - Second Degree)

TRAVIS THOMAS

on or about September 24, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Girsan handgun, serial number T6368-19CL00148; and/or 9mm Taurus G2C handgun, serial number 1C056067, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Unlawful Possession of a Weapon - Second Degree)

KAMAR WALKER

on or about September 24, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Girsan handgun, serial number T6368-19CL00148, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Manufacture, Transport, Disposition
of a Weapon - Fourth Degree)

TRAVIS THOMAS

on or about September 24, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a Girsan 9mm handgun, serial number T6368-19CL00148, and/or 9mm Taurus G2C handgun, serial number 1C056067, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Manufacture, Transport, Disposition
of a Weapon - Fourth Degree)

KAMAR WALKER

on or about September 24, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a Girsan 9mm handgun, serial number T6368-19CL00148, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Unlawful Possession of a Weapon - Second Degree)

TRAVIS THOMAS

and

NEILZHON WILLIAMS

on or about October 3, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Colt Police .38 Special revolver, serial number C59203, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Manufacture, Transport, Disposition
of a Weapon - Fourth Degree)

TRAVIS THOMAS

and

NEILZHON WILLIAMS

on or about October 3, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a Colt Police .38 Special revolver, serial number C59203, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Unlawful Possession of a Weapon - Second Degree)

TRAVIS THOMAS

TYQUAN EVANS

and

MARQUETTA WILSON

on or about October 22, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Taurus G2C semiautomatic pistol, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Possession of Large Capacity
Ammunition Magazines - Fourth Degree)

TRAVIS THOMAS

TYQUAN EVANS

and

MARQUETTA WILSON

on or about October 22, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess two large capacity ammunition magazines, 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 TWENTY

(Manufacture, Transport, Disposition
of a Weapon - Fourth Degree)

TRAVIS THOMAS

and

MARQUETTA WILSON

on or about October 22, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a 9mm Taurus G2C semiautomatic pistol, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Manufacture, Transport, Disposition of Large
Capacity Ammunition Magazines - Fourth Degree)

TRAVIS THOMAS

and

MARQUETTA WILSON

on or about October 22, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly did transport, ship, sell, or dispose of two large
capacity ammunition magazines, contrary to the provisions of
N.J.S.A. 2C:39-9h, N.J.S.A. 2-6, and against the peace of this
State, the government and dignity of the same.

COUNT TWENTY-TWO

(Unlawful Possession of a Weapon - Second Degree)

TRAVIS THOMAS

and

WILLIAM THOMAS

on or about October 23, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Luger caliber Taurus semiautomatic pistol, serial number TKO70816, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Possession of Hollow Nose Ammunition - Fourth Degree)

TRAVIS THOMAS

and

WILLIAM THOMAS

on or about October 23, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a prohibited weapon or device, that is, hollow nose ammunition, contrary to the provisions of N.J.S.A. 2C:39-3f, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Unlawful Possession of a Weapon - Second Degree)

TRAVIS THOMAS

on or about October 26, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9x18 Makarov .380 caliber FEG semiautomatic pistol, serial number AN4086, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Unlawful Possession of a Weapon - Second Degree)

YAQUIN PERRY

between on or about October 26, 2021, and on or about November 12, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9x18 Makarov .380 caliber FEG semiautomatic pistol, serial number AN4086, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Manufacture, Transport, Disposition
of a Weapon - Fourth Degree)

TRAVIS THOMAS

and

YAQUIN PERRY

between on or about October 26, 2021, and on or about November 12, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a 9x18 Makarov .380 caliber FEG semiautomatic pistol, serial number AN4086, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Unlawful Possession of a Weapon - Second Degree)

TRAVIS THOMAS

and

YAQUIN PERRY

on or about November 24, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 9mm Luger caliber Tisas (Turkish) semiautomatic pistol, serial number T06202121BM11495; and/or a 38 Special caliber Taurus Revolver, serial number ACG998490, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Manufacture, Transport, Disposition
of a Weapon - Fourth Degree)

TRAVIS THOMAS

and

YAQUIN PERRY

on or about November 24, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is, a 9mm Luger caliber Tisas (Turkish) semiautomatic pistol, serial number T06202121BM11495; and/or a 38 Special caliber Taurus Revolver, serial number ACG998490, without being licensed or registered to do so as provided in chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Unlawful Possession of an Assault Firearm - Second Degree)

TRAVIS THOMAS

on or about December 10, 2021, at the Borough of East Rutherford, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, a 5.56 x 45mm 223 Remington caliber American Tactical semiautomatic rifle, serial number MSA072300, contrary to the provisions of N.J.S.A. 2C:39-5f, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Unlawful Possession of a Weapon - Second Degree)

TRAVIS THOMAS

on or about December 10, 2021, at the Borough of East Rutherford, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 22 Long Rifle caliber German Sport Guns semiautomatic pistol, serial number F462899; and/or a .357 Magnum caliber Smith & Wesson revolver, serial number DDA1089, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Possession of Large Capacity
Ammunition Magazines - Fourth Degree)

TRAVIS THOMAS

on or about December 10, 2021, at the Borough of East Rutherford,
in the County of Bergen, elsewhere, and within the jurisdiction of
this Court, knowingly did possess two large capacity ammunition
magazines, 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 THIRTY TWO

(Possession of Hollow Nose Ammunition - Fourth Degree)

TRAVIS THOMAS

on or about December 10, 2021, at the Borough of East Rutherford, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did possess a prohibited weapon or device, that is, hollow nose ammunition, contrary to the provisions of N.J.S.A. 2C:39-3f, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Unlawful Possession of a Weapon - First Degree)

YAQUIN PERRY

between on or about November 12, 2021, and on or about November 24, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been previously convicted of the crime of Fourth Degree Aggravated Assault in Passaic County, on Indictment number PAS030800809I, knowingly did possess a certain weapon, that is, a 9x18 Makarov .380 caliber FEG semiautomatic pistol, serial number AN4086; and/or a 9mm Luger caliber Tisas (Turkish) semiautomatic pistol, serial number T06202121BM11495, and/or a 38 Special caliber Taurus Revolver, serial number ACG998490, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, N.J.S.A. 2C:39-5j, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Certain Persons Not to Have Weapons - Second Degree)

TRAVIS THOMAS

between on or about September 28, 2020, and on or about December 10, 2021, at the City of Paterson, in the County of Passaic, at the Borough of East Rutherford, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, having been convicted of the crimes of Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance Within 1000 feet of School Property, in Passaic County, on Indictment number PAS111000837I; Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance Within 1000 feet of School Property, in Passaic County, on Indictment number PAS111100934-II; and/or Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance Within 1000 feet of School Property, in Passaic County, on Accusation number PAS180200160A, did purchase, own, possess, or control the following firearm: a 9mm Smith & Wesson, Model SD9VE, semiautomatic pistol, serial number FZK2994; and/or a 9mm Hi-Point semiautomatic pistol; and/or 9mm Girsan handgun, serial number T6368-19CL00148; and/or 9mm Taurus G2C 9 handgun, serial number 1C056067; a Colt Police Special .38 revolver, serial number C59203; 9mm Taurus G2C semiautomatic pistol, serial number TMD41809;

and/or a 9mm Luger caliber Taurus semiautomatic Pistol, serial number TKO70816; and/or a 9x18 Makarov .380 caliber FEG semiautomatic pistol serial number AN4086; and/or a 9mm Luger caliber Tisas (Turkish) semiautomatic pistol, serial number T06202121BM11495; and/or a 38 Special caliber Taurus Revolver, serial number ACG998490; and/or 5.56 x 45mm 223 Remington caliber American Tactical semiautomatic rifle, serial number MSA072300, 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.

COUNT THIRTY-FIVE

(Certain Persons Not to Have Weapons - Second Degree)

KAMAR WALKER

between on or about September 28, 2020, and on or about September 24, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance, in Passaic County, on Accusation number PAS200700291-A, did purchase, own, possess, or control the following firearm: a 9mm Smith & Wesson, Model SD9VE, semiautomatic pistol, serial number FZK2994; and/or a Girsan 9mm handgun, serial number T6368-19CL00148, 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.

COUNT THIRTY-SIX

(Certain Persons Not to Have Weapons - Second Degree)

KARIE WASHINGTON

between on or about February 16, 2021, and on or about March 7, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crimes of Second Degree Unlawful Possession of a Weapon, in Passaic County, on Indictment number PAS131000916I; and/or Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance Within 1000 feet of School Property, in Passaic County, on Indictment number PAS70400314-I, did purchase, own, possess, or control the following firearm: a semi-automatic handgun, 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.

COUNT THIRTY-SEVEN

(Certain Persons Not to Have Weapons - Second Degree)

TYQUAN EVANS

on or about October 22, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crimes of Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance, on Indictment number PAS030600525I; Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance Within 1000 feet of School Property, in Passaic County, on Indictment number PAS050300318I; Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance, in Passaic County, on Indictment number PAS1105000435I; Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance, in Passaic County, on Indictment number PAS0130100041I did purchase, own, possess, or control the following firearm: 9mm Taurus G2C semiautomatic pistol, serial number TMD41809, 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.

COUNT THIRTY-EIGHT

(Certain Persons Not to Have Weapons - Second Degree)

WILLIAM THOMAS

on or about October 23, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crimes of Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance Within 1000 feet of School Property and Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance, in Passaic County, both on Indictment number PAS120200138I; and/or Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance, in Passaic County, on Indictment number PAS061101303I did purchase, own, possess, or control the following firearm: a Taurus PT709 Slim Pistol, serial number TKO70816, 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.

COUNT THIRTY-NINE

(Certain Persons Not to Have Weapons - Second Degree)

YAQUIN PERRY

between on or about November 12, 2021, and on or about November 24, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been previously convicted of the crimes of Fourth Degree Aggravated Assault in Passaic County, on Indictment number PAS030800809I; and/or Third Degree Possession with Intent to Distribute/Distribution of a Controlled Dangerous Substance in Passaic County, on Indictment number PAS061101297I, did purchase, own, possess, or control the following firearms: a 9x18 Makarov .380 caliber FEG semiautomatic pistol, serial number AN4086; and/or a 9mm Luger caliber Tisas (Turkish) semiautomatic pistol, serial number T06202121BM11495, and/or a 38 Special caliber Taurus Revolver, serial number ACG998490, 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 Pearl Minato
Director
Division of Criminal Justice

A TRUE BILL:

s/ [REDACTED]
Foreperson

10/21/22
Dated