



EUGEONCE COLEMAN

KASAUN COLEMAN

JERMAINE GRAY

ALLISON WILLIAMS

NYESHA COLEMAN

LINWOOD BUGG

and

JHONATAN GARCIA

who are named as defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about January 6, 2020, and on or about June 5, 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 Operation of a Facility for the Sale of Stolen Automobile Parts, Receiving Stolen Property, and Tampering with Public Records, did agree together 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 maintain or operate any premises, place, or facility used for the remodeling, repainting, or separating of automobile parts for resale of any stolen automobile, contrary to the provisions of N.J.S.A. 2C:20-16a; and

2. Knowingly receive or bring into this State movable property of another knowing that it has been stolen, or believing that it is probably stolen, contrary to the provisions of N.J.S.A. 2C:20-7a.

3. Knowingly make, present, offer for filing, or use any record, document, or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, knowing it to be false, contrary to the provisions of N.J.S.A. 2C:28-7a(2).

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

(Receiving Stolen Property - Third Degree)

EUGENE COLEMAN

EUGEONCE COLEMAN

KASAUN COLEMAN

LINWOOD BUGG

and

JHONATAN GARCIA

between on or about January 6, 2020, and on or about June 5, 2020, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did receive or bring into this State movable property of another knowing that it had been stolen, or believing that it was probably stolen, contrary to the provisions of N.J.S.A. 2C:20-7a, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Operation of a Facility for the Sale of Stolen Automobile Parts  
- Second Degree)

EUGENE COLEMAN

KASAUN COLEMAN

and

JERMAINE GRAY

between on or about January 6, 2020, and on or about June 5, 2020,  
at the City of Paterson, in the County of Passaic, elsewhere, and  
within the jurisdiction of this Court, did knowingly maintain or  
operate a premises, place, or facility used for the remodeling,  
repainting, or separating of automobile parts for resale of stolen  
automobiles, contrary to the provisions of N.J.S.A. 2C:20-16a, and  
against the peace of this State, the government and dignity of the  
same.

COUNT FOUR

(False Statement to Motor Vehicle Commission - Third Degree)

EUGEONCE COLEMAN

on or about April 9, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did make a misrepresentation or false statement in any title papers or other papers submitted to the Chief Administrator of the New Jersey Motor Vehicle Commission in connection therewith, contrary to the provisions of N.J.S.A. 2C:21-4.8b(1), and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Filing a False Motor Vehicle Title - Third Degree)

EUGEONCE COLEMAN

on or about April 9, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did use title papers on or for a wrong motor vehicle, with intent to evade or violate the requirements of chapter 10 of Title 39 of the Revised Statutes, contrary to the provisions of N.J.S.A. 2C:21-4.8b(5), and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Tampering with Public Records - Third Degree)

EUGEONCE COLEMAN

on or about April 9, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did make, present, offer for filing, or use a record, document, or thing, knowing it to be false, with purpose that it be taken as a genuine part of information or records belonging to, received, or kept by the government for information or record, or required by law to be kept by others for information of the government, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.



COUNT SEVEN

(False Statement to Motor Vehicle Commission - Third Degree)

KASAUN COLEMAN

on or about January 27, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did make a misrepresentation or false statement in any title papers or other papers submitted to the Chief Administrator of the New Jersey Motor Vehicle Commission in connection therewith, contrary to the provisions of N.J.S.A. 2C:21-4.8b(1), and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Filing a False Motor Vehicle Title - Third Degree)

KASAUN COLEMAN

on or about January 27, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did use title papers on or for a wrong motor vehicle, with intent to evade or violate the requirements of chapter 10 of Title 39 of the Revised Statutes, contrary to the provisions of N.J.S.A. 2C:21-4.8b(5), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Tampering with Public Records - Third Degree)

KASAUN COLEMAN

on or about January 27, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did make, present, offer for filing, or use a record, document, or thing, knowing it to be false, with purpose that it be taken as a genuine part of information or records belonging to, received, or kept by the government for information or record, or required by law to be kept by others for information of the government, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT TEN

(False Statement to Motor Vehicle Commission - Third Degree)

NYESHA COLEMAN

on or about November 23, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did make a misrepresentation or false statement in any title papers or other papers submitted to the Chief Administrator of the New Jersey Motor Vehicle Commission in connection therewith, contrary to the provisions of N.J.S.A. 2C:21-4.8b(1), and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Filing a False Motor Vehicle Title - Third Degree)

NYESHA COLEMAN

on or about November 23, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did use title papers on or for a wrong motor vehicle, with intent to evade or violate the requirements of chapter 10 of Title 39 of the Revised Statutes, contrary to the provisions of N.J.S.A. 2C:21-4.8b(5), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Tampering with Public Records - Third Degree)

NYESHA COLEMAN

on or about November 23, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did make, present, offer for filing, or use a record, document, or thing, knowing it to be false, with purpose that it be taken as a genuine part of information or records belonging to, received, or kept by the government for information or record, or required by law to be kept by others for information of the government, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(False Statement to Motor Vehicle Commission - Third Degree)

ALLISON WILLIAMS

on or about January 22, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did make a misrepresentation or false statement in any title papers or other papers submitted to the Chief Administrator of the New Jersey Motor Vehicle Commission in connection therewith, contrary to the provisions of N.J.S.A. 2C:21-4.8b(1), and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Filing a False Motor Vehicle Title - Third Degree)

ALLISON WILLIAMS

on or about January 22, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did use title papers on or for a wrong motor vehicle, with intent to evade or violate the requirements of chapter 10 of Title 39 of the Revised Statutes, contrary to the provisions of N.J.S.A. 2C:21-4.8b(5), and against the peace of this State, the government and dignity of the same.



COUNT FIFTEEN

(Tampering with Public Records - Third Degree)

ALLISON WILLIAMS

on or about January 22, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did make, present, offer for filing, or use a record, document, or thing, knowing it to be false, with purpose that it be taken as a genuine part of information or records belonging to, received, or kept by the government for information or record, or required by law to be kept by others for information of the government, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

*s/Jacqueline Smith*

SDAG Jacqueline Smith  
Deputy Chief, Specialized Crimes  
Division of Criminal Justice

A TRUE BILL:

*s/Damian L. Fryer*

Alternate Foreperson

**Dated: 5/6/2022**