SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury Number <u>SGJ766-22-26</u> Superior Court Docket Number 22-3-31-S

STATE OF NEW JERSEY)	
V.)	INDICTMENT
QUANEISHA FROST-CLARK)	
and)	
MARQUISE PETERSON)	

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

COUNT ONE

(Conspiracy - Second Degree)

QUANEISHA FROST-CLARK

and

MARQUISE PETERSON

who are named as defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about February 28, 2020, and on or about July 26, 2020, at the City of Trenton, in the County of Mercer, in the State of Georgia, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Transporting Weapons into the State for Unlawful Sale and/or Possession, Receipt, or Transfer of a Community Gun and/or Transfer, Unlawful Disposition of Firearms, did agree together, that:

1. One or more of them would engage in conduct which would constitute the aforesaid crimes, 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 <u>N.J.S.A.</u> 2C:39-9i.

B. Knowingly or purposely possess, receive, and/or transfer a community gun, with the purpose of engaging in criminal activity and/or using it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(2).

C. 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.

All in violation of <u>N.J.S.A.</u> 2C:5-2, and against the peace of this State, the government and dignity of the same.

2

COUNT TWO

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

QUANEISHA FROST-CLARK

and

MARQUISE PETERSON

between on or about February 29, 2020, and on or about April 14, 2020, at the City of Trenton, in the County of Mercer, in the State of Georgia, 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 <u>N.J.S.A.</u> 2C:39-9i, and <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Possession, Receipt, or Transfer of a Community Gun - Second Degree)

QUANEISHA FROST-CLARK

and

MARQUISE PETERSON

between on or about February 29, 2020, and on or about July 26, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess, receive, and/or transfer community guns, that is, a Taurus 9 mm, serial number TMT31161 and/or a Ruger, 9mm, serial number 382-65381, and/or a Ruger, 9 mm serial number 339-01859, with the purpose of engaging in criminal activity, and/or using it unlawfully against the person or propertyof another, contrary to the provisions of <u>N.J.S.A.</u> 2C:39-4a(2), and <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

4

COUNT FOUR

(Unlawful Possession of a Weapon - Second Degree)

QUANEISHA FROST-CLARK

and

MARQUISE PETERSON

between on or about February 29, 2020, and on or about March 23, 2020, 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, Taurus 9 mm, serial number TMT31161, without first having 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 FIVE

(Unlawful Possession of a Weapon - Second Degree)

QUANEISHA FROST-CLARK

and

MARQUISE PETERSON

between on or about April 7, 2020, and on or about July 26, 2020, 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 Ruger 9 mm serial number 382-65381, without first having 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 SIX

(Unlawful Possession of a Weapon - Second Degree)

QUANEISHA FROST-CLARK

and

MARQUISE PETERSON

between on or about April 7, 2020, and on or about July 15, 2020, 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 Ruger, 9 mm serial number 339-01859, without first having 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 SEVEN

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

QUANEISHA FROST-CLARK

and

MARQUISE PETERSON

between on or about February 29, 2020, and on or about March 23, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is a Taurus 9 mm, serial number TMT 31161, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of <u>N.J.S.A.</u> 2C:39-9d, and <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

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

QUANEISHA FROST-CLARK

and

MARQUISE PETERSON

on or about April 7, 2020, and on or about July 26, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is a Ruger 9 mm serial number 382-65381, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of <u>N.J.S.A.</u> 2C:39-9d, and <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

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

QUANEISHA FROST-CLARK

and

MARQUISE PETERSON

on or about April 7, 2020, and on or about July 15, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell, or dispose of a firearm, that is a Ruger, 9 mm serial number 339-01859, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of <u>N.J.S.A.</u> 2C:39-9d, and <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

AAG Lyndsay V. Ruotolo Director Division of Criminal Justice

A TRUE BILL:

Foreperson

Date: <u>3/9/2022</u>