FILED

FEBRUARY 24, 2022

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ767-22-7
Superior Court
Docket Number 22-2-24-S

STATE OF NEW JERSEY)

v.)

MARQUISE D. OGAWA)

CHYAIRE J. LEE) INDICTMENT

and)

JAZMIN L. SCOTT

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

COUNT ONE

(Conspiracy - First Degree)

MARQUISE D. OGAWA

CHYAIRE J. LEE

and

JAZMIN L. SCOTT

who are named as defendants herein, and other individuals 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 August 2021 through November 2021, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of

this Court, with the purpose of promoting or facilitating the commission of the crimes of human trafficking, facilitation of human trafficking and promoting prostitution, 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 hold, recruit, lure, entice, harbor, transport, provide or obtain, by any means, a child under 18 years of age, to engage in sexual activity, contrary to the provisions of N.J.S.A. 2C:13-8a(3);
- 2. Knowingly provide services, resources, or assistance, including financial support, business services, lodging, and transportation, to another with the knowledge that the services, resources, or assistance were intended to be used in furtherance of the commission of the crime of human trafficking, in violation of N.J.S.A. 2C:13-8, contrary to the provisions of N.J.S.A. 2C:13-9a(1); and
- 3. Knowingly promote prostitution of a child under 18, contrary to the provisions of N.J.S.A. 2C:34-1b(3),

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

(Human Trafficking - First Degree)

MARQUISE D. OGAWA

CHYAIRE J. LEE

and

JAZMIN L. SCOTT

between on or about August 2021 through November 2021, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did hold, recruit, lure, entice, harbor, transport, provide or obtain by any means, a child under 18 years of age, that is, to engage in sexual activity as defined in N.J.S.A. 2C:34-1a, contrary to the provisions of N.J.S.A. 2C:13-8a(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Facilitating Human Trafficking - Second Degree)

MARQUISE D. OGAWA

CHYAIRE J. LEE

and

JAZMIN L. SCOTT

between on or about August 2021 through November 2021, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did provide services, resources, or assistance, including financial support, business services, lodging, and transportation, to another with knowledge that the services, resources, or assistance were intended to be used in furtherance of the commission of the crime of human trafficking in violation of N.J.S.A. 2C:13-8, contrary to the provisions of N.J.S.A. 2C:13-9a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Promoting Prostitution - First Degree)

MARQUISE D. OGAWA

CHYAIRE J. LEE

and

JAZMIN L. SCOTT

between on or about August 2021 through November 2021, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did promote the prostitution of a child under 18, that is,

contrary to the provisions of N.J.S.A. 2C:34-1b(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Promoting Organized Street Crime - First Degree)

MARQUISE D. OGAWA

between on or about August 2021 through November 2021, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did conspire with others as an organizer, supervisor, financier or manager to promote prostitution, in violation of N.J.S.A. 2C:34-1b(3), contrary to the provisions of N.J.S.A. 2C:33-30, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Endangering the Welfare of a Child - Third Degree)

MARQUISE D. OGAWA

CHYAIRE J. LEE

and

JAZMIN L. SCOTT

between on or about August 2021 through November 2021, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did engage in sexual conduct which would impair or debauch the morals of a child, that is, $\overline{}$, contrary to the provisions of $\underline{N.J.S.A.2C:24-4a(1)}$, and against the peace of this State, the government and dignity of the same.

AAG Annmarie Taggart

Deputy Director

NJ Division of Criminal Justice

A TRUE BILL:

Foreperson

Date: <u>2/24/2022</u>