

**FILED**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

APR 10 2015  
State Grand Jury Judge

State Grand Jury  
Number SGJ665-15-8  
Superior Court 15-04-00043-S  
Docket Number \_\_\_\_\_

STATE OF NEW JERSEY )

v. )

INDICTMENT

ERNESTINE BOWMAN )

GLEN BOWMAN, SR. )

JESSICA COPELAND )

TOKINA WILLIAMS )

and )

GLEN BOWMAN, JR. )

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

COUNT ONE

(Conspiracy - First Degree)

ERNESTINE BOWMAN

GLEN BOWMAN, SR.

JESSICA COPELAND

TOKINA WILLIAMS

and

GLEN BOWMAN, JR.

who are named as defendants herein, and other individuals whose  
identities are both known and unknown to the Grand Jurors, who

are named as co-conspirators but not as defendants herein, between on or about June 1, 2014, and on or about October 1, 2014, at the City of Clifton, in the County of Passaic, and at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of human trafficking, endangering the welfare of a child, and promoting prostitution did agree 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 did 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 did procure or attempt to procure a person to engage in sexual activity, or to provide labor or services, whether for himself or another person, knowing that the person provided or to be provided was a victim of human trafficking, or under circumstances in which a reasonable person would conclude that there was a substantial likelihood that the person was a victim of human trafficking, contrary to the provisions of N.J.S.A. 2C:13-9;

3. Knowingly did engage in sexual conduct which would impair or debauch the morals of a child under 18 years of age, that is C.P., born November 15, 1997, contrary to the provisions of N.J.S.A. 2C:24-4a(1); and

4. Knowingly did promote prostitution of a child under 18, contrary to 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)

ERNESTINE BOWMAN

GLEN BOWMAN, SR.

JESSICA COPELAND

TOKINA WILLIAMS

and

GLEN BOWMAN, JR.

between on or about June 1, 2014 and on or about October 1, 2014, at the City of Clifton, in the County of Passaic, and at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly, did hold, recruit, lure, entice, harbor, transport, provide or obtain, a child under 18 years of age, that is, C.P. born November 15, 1997, to engage in sexual activity, contrary to the provisions of N.J.S.A. 2C:13-8a(3) and 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)

ERNESTINE BOWMAN

GLEN BOWMAN, SR.

JESSICA COPELAND

TOKINA WILLIAMS

and

GLEN BOWMAN, JR.

between on or about June 1, 2014 and on or about October 1, 2014, in the City of Clifton, in the County of Passaic, and in the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did procure or attempt to procure a person to engage in sexual activity, or to provide labor or services, whether for himself or another person, knowing that the person provided or to be provided was a victim of human trafficking, or under circumstances in which a reasonable person would conclude that there was a substantial likelihood that the person was a victim of human trafficking, contrary to the provisions of N.J.S.A. 2C:13-9 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Endangering the Welfare of a Child - First Degree)

ERNESTINE BOWMAN

and

GLEN BOWMAN, SR.

between on or about September 21, 2014 and on or about October 1, 2014, at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly, did cause or permit a child, that is C.P. born November 15, 1997, to engage in a prohibited sexual act, knowing or intending that the prohibited act may be photographed, filmed, reproduced, or reconstructed in any manner, including on the Internet, contrary to N.J.S.A. 2C:24-4b(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Endangering the Welfare of a Child - Second Degree)

ERNESTINE BOWMAN

and

GLEN BOWMAN, SR.

between on or about September 21, 2014 and on or about October 1, 2014, at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of the Court, knowingly, did distribute an item depicting the sexual exploitation or abuse of a child, that is C.P. born November 15, 1997, contrary to the provisions of N.J.S.A. 2C:24-4b(5)(a)(i) and 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)

ERNESTINE BOWMAN

GLEN BOWMAN, SR.

JESSICA COPELAND

TOKINA WILLIAMS

and

GLEN BOWMAN, JR.

between on or about June 1, 2014 and on or about October 1, 2014, at the City of Clifton, in the County of Passaic, and at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did engage in sexual conduct which would impair or debauch the morals of a child under the age of 18, that is, C.P. born November 15, 1997, contrary to the provisions of N.J.S.A. 2C:24-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT SEVEN

(Promoting Prostitution - First Degree)

ERNESTINE BOWMAN

GLEN BOWMAN, SR.

JESSICA COPELAND

TOKINA WILLIAMS

and

GLEN BOWMAN, JR.

between on or about June 1, 2014 and on or about October 1, 2014, at the City of Clifton, in the County of Passaic, and at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did promote the prostitution of a child under 18, that is C.P. born November 15, 1997, contrary to N.J.S.A. 2C:34-1b(3), and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Promoting Prostitution - Second Degree)

TOKINA WILLIAMS

on or about October 1, 2014, at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly, did engage in prostitution with a person under the age of 18, and/or did enter into or remain in a house of prostitution for the purpose of engaging in sexual activity with a child under 18, or did solicit or request a child under the age of 18 to engage in sexual activity, that is, C.P. born November 15, 1997, contrary to the provisions of N.J.S.A. 2C:34-1b(7), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Promoting Prostitution - Third Degree)

ERNESTINE BOWMAN

GLEN BOWMAN, SR.

JESSICA COPELAND

and

GLEN BOWMAN, JR.

between on or about June 1, 2014 and on or about October 1, 2014, at the City of Clifton, in the County of Passaic, and at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did compel another, that is C.P., to engage in or promote prostitution, contrary to the provisions of N.J.S.A. 2C:34-1b(5) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Promoting Prostitution - Third Degree)

ERNESTINE BOWMAN

GLEN BOWMAN, SR.

and

JESSICA COPELAND

between on or about June 1, 2014 and on or about October 1, 2014, at the City of Clifton, in the County of Passaic, and at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did promote prostitution by owning, controlling, managing, supervising, or otherwise keeping, alone or in association with another, a house of prostitution or a prostitution business, contrary to the provisions of N.J.S.A. 2C:34-1b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Promoting Prostitution - Third Degree)

ERNESTINE BOWMAN

GLEN BOWMAN, SR.

JESSICA COPELAND

and

GLEN BOWMAN, JR.

between on or about June 1, 2014 and on or about October 1, 2014, at the City of Clifton, in the County of Passaic, and at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did promote prostitution by encouraging, inducing, or otherwise purposely causing another, that is C.P., to become or remain a prostitute, contrary to the provisions of N.J.S.A. 2C:34-1b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Promoting Prostitution - Third Degree)

ERNESTINE BOWMAN

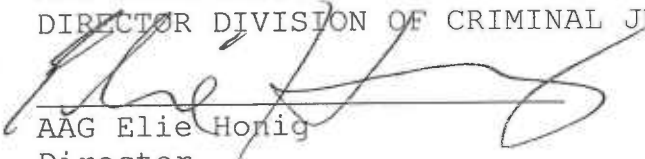
GLEN BOWMAN, SR.

and

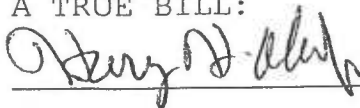
GLEN BOWMAN, JR.

between on or about June 1, 2014 and on or about October 1, 2014, at the City of Clifton, in the County of Passaic, and at the City of South Hackensack, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did promote prostitution by transporting a person into or within this State with the purpose to promote that person's engaging in prostitution, or procuring or paying for transportation with that purpose, contrary to the provisions of N.J.S.A. 2C:34-1a(4)(f), N.J.S.A. 2C:34-1b(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

AAG ELIE HONIG  
DIRECTOR DIVISION OF CRIMINAL JUSTICE

  
AAG Elie Honig  
Director  
NJ Division of Criminal Justice

A TRUE BILL:

  
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Foreperson

Date: April 10, 2015

**FILED**

APR 10 2015

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ665-15-8

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STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

ERNESTINE BOWMAN )

GLEN BOWMAN, SR. )

JESSICA COPELAND )

TOKINA WILLIAMS )

and )

GLEN BOWMAN, JR. )

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 10<sup>th</sup> day of April, 2015, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Bergen be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Bergen for filing.

  
Pedro J. Jimenez, Jr., J.S.C.