

COMPLAINT

COMPLAINT NUMBER				THE STATE OF NEW JERSEY	
1303		2017	001361	VS.	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	ANDRE P PARKER	
ASBURY PARK MUNICIPAL COURT ONE MUNICIPAL PLAZA ASBURY PARK NJ 07712-0000 732-775-1765 COUNTY OF: MONMOUTH				ADDRESS: 916 1/2 SUNSET AVE APT C ASBURY PARK NJ 07712-0000	
# of CHARGES 6	CO-DEFTS 1	POLICE CASE #:		DEFENDANT INFORMATION	
COMPLAINANT NAME: DET. T MANZO 132 JERSEYVILLE AVE FREEHOLD NJ 07728				SEX: M EYE COLOR: BROWN DOB: 09/18/1985 DRIVER'S LIC. #: SOCIAL SECURITY #: TELEPHONE #: LIVESCAN PCN #:	
				DL STATE: SBI #: (C)	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 02/26/2017 in ASBURY PARK CITY, MONMOUTH County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, DID PURPOSELY, KNOWINGLY OR RECKLESSLY TORMENTING, TORTURING, UNNECESSARILY OR CRUELLY BEATING, AND/OR CRUELLY ABUSING A FEMALE PIT BULL CANINE, RESULTING IN SERIOUS BODILY INJURY

WITHIN THE JURISDICTION OF THIS COURT, DID PURPOSELY, KNOWINGLY OR RECKLESSLY FAILING TO PROVIDE A FEMALE PIT BULL CANINE WITH NECESSARY CARE, AS THE OWNER OR PERSON OTHERWISE CHARGED WITH HER CARE, RESULTING IN IN SERIOUS BODILY INJURY

WITHIN THE JURISDICTION OF THIS COURT, DID PURPOSELY, KNOWINGLY OR RECKLESSLY CAUSING OR PROCURING ONE OF THE ABOVE ACTS BY ANY DIRECT OR INDIRECT MEANS, INCLUDING BUT NOT LIMITED TO THROUGH THE USE OF ANOTHER LIVING ANIMAL OR CREATURE, RESULTING IN SERIOUS BODILY INJURY TO A FEMALE PIT BULL CANINE

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY AND PURPOSELY SUPPRESS OR in violation of:

Original Charge	1) 4:22-17C(1)	2) 4:22-17C(2)	3) 4:22-17C(3)
Amended Charge			

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment

Signed: DET. T MANZO Date: 08/17/2017

You will be notified of your Central First Appearance/CJP date to be held at the Superior Court in the county of MONMOUTH at the following address: MONMOUTH COUNTY COURTS
71 MONUMENT PARK PO BOX 1271 FREEHOLD NJ 07728-0000
Date of Arrest: Appearance Date: Time: Phone: 732-677-4500

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator Date Signature of Judge Date

☐ Probable cause IS found for the issuance of this complaint.

Signature and Title of Judicial Officer Issuing Warrant Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: by: (if different from judicial officer that issued warrant)

☒ Domestic Violence – Confidential

☐ Related Traffic Tickets or Other Complaints

☐ Serious Personal Injury/ Death Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
- ☐ No possession firearms/weapons
- ☐ Other (specify):

ORIGINAL

COMPLAINT

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001361

STATE V.

ANDRE P PARKER

COURT CODE PREFIX YEAR SEQUENCE NO.

CONCEALING ANY EVIDENCE OF A CRIME WITH THE PURPOSE TO HINDER HIS OWN DETENTION, APPREHENSION, INVESTIGATION, PROSECUTION, CONVICTION OR PUNISHMENT FOR AN OFFENSE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY AND PURPOSELY PROVIDE FALSE INFORMATION TO A LEO WITH THE PURPOSE TO HINDER HIS OWN DETENTION, APPREHENSION, INVESTIGATION, PROSECUTION, CONVICTION OR PUNISHMENT FOR AN OFFENSE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY AND PURPOSELY, BELIEVING THAT AN OFFICIAL PROCEEDING OR INVESTIGATION IS PENDING OR IS ABOUT TO BE INSTITUTED, REMOVING ANY "THING OF PHYSICAL SUBSTANCE" WITH THE PURPOSE TO IMPAIR ITS VERITY OR AVAILABILITY IN THAT OFFICIAL PROCEEDING OR INVESTIGATION

Original Charge	4) 2C:29-3B(1)	5) 2C:29-3B(4)	6) 2C:28-6(1)
Amended Charge			
			COMPLAINT
			Page 1 of 7 NJ/CDR2 1/1/2017

Affidavit of Probable Cause

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1303		2017	001361
ASBURY PARK MUNICIPAL COURT ONE MUNICIPAL PLAZA ASBURY PARK NJ 07712-0000 732-775-1765 COUNTY OF: MONMOUTH			
# of CHARGES 6	CO-DEFTS	POLICE CASE #:	
COMPLAINANT DET. T MANZO NAME: 132 JERSEYVILLE AVE FREEHOLD NJ 07728		DEFENDANT INFORMATION SEX: M EYE COLOR: BROWN DOB: 09/18/1985 DRIVER'S LIC: [REDACTED] DL STATE: NJ SOCIAL SECURITY #: [REDACTED] SBI #: [REDACTED] TELEPHONE #: [REDACTED] (C) LIVESCAN PCN #:	

THE STATE OF NEW JERSEY

VS.

ANDRE P PARKER

ADDRESS: 916 1/2 SUNSET AVE APT C

ASBURY PARK NJ 07712-0000

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:
Investigation conducted by the Monmouth County SPCA Police and the MCPO showed that the defendant owned a severely abused and starved female pit bull canine, and that he concealed it and removed from his residence to another to avoid detection

Affidavit of Probable Cause

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2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

Investigation by law enforcement

3. If victim was injured, provide the extent of the injury:

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DET. T MANZO LAW ENFORCEMENT OFFICER

Date: 08/17/2017

Affidavit of Probable Cause

Page 6 of 7

1/1/2017

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

THE STATE OF NEW JERSEY :

Plaintiff, :

v. :

Indictment No. 17-0801140
Case No. 17-03224

ANDRE PARKER and :

TARA ROBINSON, :

:

Defendants.

FIRST COUNT

ANIMAL CRUELTY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ANDRE PARKER, on or about diverse dates between January 1, 2017 through February 24, 2017, in or about the City of Asbury Park, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Animal Cruelty, by purposely, knowingly, or recklessly tormenting, torturing, maiming, hanging, poisoning, unnecessarily or cruelly beating, cruelly abusing, or needlessly mutilating a living animal or creature, to wit: starving and beating a pit bull mix known as "Destiny", causing serious bodily injury, contrary to the provisions of N.J.S.A. 4:22-17c(1) and against the peace of this State, the Government, and dignity of the same.

SECOND COUNT

ANIMAL CRUELTY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ANDRE PARKER, on or about diverse dates between January 1, 2017 through February 24, 2017, in or about the City of Asbury Park, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Animal Cruelty, by purposely, knowingly, or recklessly failing to provide an animal with necessary care as the owner or person charged with her care, to wit: starving and not treating the wounds of a pit bull mix known as "Destiny", causing serious bodily injury, contrary to the provisions of N.J.S.A. 4:22-17c(2) and against the peace of this State, the Government, and dignity of the same.

THIRD COUNT

ANIMAL CRUELTY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ANDRE PARKER, on or about diverse dates between January 1, 2017 through February 24, 2017, in or about the City of Asbury Park, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Animal Cruelty, by purposely, knowingly, or recklessly causing or procuring the crimes alleged in Count One

and Count Two by direct and indirect means, including but not limited to through the use of another living creature, to wit: inflicting serious wounds to the pit bull mix known as "Destiny", either through the use of another canine(s) or other means, causing serious bodily injury, contrary to the provisions of N.J.S.A. 4:22-17c(3) and against the peace of this State, the Government, and dignity of the same.

FOURTH COUNT

ANIMAL CRUELTY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TARA ROBINSON, on or about diverse dates between February 24, 2017 through February 26, 2017, in or about the Township of Neptune, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Animal Cruelty, by purposely, knowingly, or recklessly tormenting, torturing, maiming, hanging, poisoning, unnecessarily or cruelly beating, cruelly abusing, or needlessly mutilating a living animal or creature, to wit: starving and dehydrating a pit bull mix known as "Destiny", causing serious bodily injury, contrary to the provisions of N.J.S.A. 4:22-17c(1) and against the peace of this State, the Government, and dignity of the same.

FIFTH COUNT

ANIMAL CRUELTY

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TARA ROBINSON, on or about diverse dates between February 24, 2017 through February 26, 2017, in or about the Township of Neptune, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Animal Cruelty, by purposely, knowingly, or recklessly failing to provide an animal with necessary care as the owner or person charged with her care, to wit: starving and not treating the wounds of a pit bull mix known as "Destiny", causing serious bodily injury, contrary to the provisions of N.J.S.A. 4:22-17c(2) and against the peace of this State, the Government, and dignity of the same.

SIXTH COUNT

HINDERING APPREHENSION OF ONESELF

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ANDRE PARKER, on or about February 24, 2017, in or about the City of Asbury Park, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Hindering Apprehension of Oneself, by, with purpose to hinder his own detention, apprehension, investigation, prosecution, conviction, or

punishment for the crime of Animal Cruelty, suppressing, by way of concealment or destruction, any evidence of the crime or tamper with a document or other source of information, regardless of its admissibility in evidence, which might have aided in his discovery or apprehension or in the lodging of a charge against him, to wit: removing the abused and seriously injured pit bull mix known as "Destiny" from his home so that it would not be discovered by law enforcement, contrary to the provisions of N.J.S.A. 2C:29-3b(1), and against the peace of this State, the Government, and dignity of the same.

SEVENTH COUNT

HINDERING APPREHENSION OF ONESELF

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ANDRE PARKER, on or about February 24, 2017, in or about the City of Asbury Park, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Hindering Apprehension of Oneself, by, with purpose to hinder his own detention, apprehension, investigation, prosecution, conviction, or punishment for the crime of Animal Cruelty, giving false information to a law enforcement officer, contrary to the provisions of N.J.S.A. 2C:29-3b(4), and against the peace of this State, the Government, and dignity of the same.

EIGHTH COUNT

TAMPERING WITH PHYSICAL EVIDENCE

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ANDRE PARKER, on or about February 24, 2017, in or about the City of Asbury Park, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Tampering with Physical Evidence, by, believing that an official proceeding or investigation is pending or about to be instituted, altering, destroying, concealing or removing any article, object, record, document or other thing of physical substance, to wit: removing an abused and severely injured pit bull mix known as "Destiny" from his residence with purpose to impair its verity or availability in such proceeding or investigation, contrary to the provisions of N.J.S.A. 2C:28-6(1), and against the peace of this State, the Government, and dignity of the same.

NINTH COUNT

OBSTRUCTING THE ADMINISTRATION OF LAW

OR OTHER GOVERNMENTAL FUNCTION

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that ANDRE PARKER, on or about February 24, 2017, in or about the City of Asbury Park, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Obstructing the Administration of Law or Other Governmental Function, by purposely obstructing,

impairing or perverting the administration of law or other governmental function, or preventing or attempting to prevent a public servant from lawfully performing an official function by means of flight, intimidation, force, violence, or physical interference or obstacle, or by means of any independently unlawful act, thereby obstructing the detection or investigation of a crime, to wit: Animal Cruelty, contrary to the provisions of N.J.S.A. 2C:29-1, and against the peace of this State, the Government, and dignity of the same.

TENTH COUNT

HINDERING APPREHENSION OF ANOTHER

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TARA ROBINSON, on or about diverse dates between February 24, 2017 through February 26, 2017, in or about the Township of Neptune, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Hindering Apprehension, by, with purpose to hinder the detention, apprehension, investigation, prosecution, conviction, or punishment of ANDRE PARKER for the third degree crime of Animal Cruelty, suppressing, by means of concealment or destruction, any evidence of the crime, or tampering with a witness, informant, document, or other source of information, regardless of its admissibility in evidence, which might aid in the discovery or apprehension of ANDRE PARKER or in the lodging of a charge against him, to wit: receiving and concealing the abused and severely injured pit bull mix known as "Destiny",

contrary to the provisions of N.J.S.A. 2C:29-3a(3), and against the peace of this State, the Government, and dignity of the same.

ELEVENTH COUNT

HINDERING APPREHENSION OF ANOTHER

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TARA ROBINSON, on or about diverse dates between February 24, 2017 through February 26, 2017, in or about the Township of Neptune, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Hindering Apprehension, by, with purpose to hinder the detention, apprehension, investigation, prosecution, conviction, or punishment of ANDRE PARKER for the third degree crime of Animal Cruelty, giving false information to a law enforcement officer, contrary to the provisions of N.J.S.A. 2C:29-3a(7), and against the peace of this State, the Government, and dignity of the same.

TWELFTH COUNT

HINDERING APPREHENSION OF ONESELF

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TARA ROBINSON, on or about February 26, 2017, in or about the Township of Neptune, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Hindering Apprehension of Oneself, by, with purpose to hinder her own detention,

apprehension, investigation, prosecution, conviction, or punishment for the crime of Animal Cruelty, suppressing, by way of concealment or destruction, any evidence of the crime or tamper with a document or other source of information, regardless of its admissibility in evidence, which might have aided in his discovery or apprehension or in the lodging of a charge against her, to wit: concealing the abused and severely injured pit bull mix known as "Destiny" behind her couch, contrary to the provisions of N.J.S.A. 2C:29-3b(1), and against the peace of this State, the Government, and dignity of the same.

THIRTEENTH COUNT

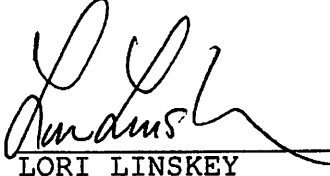
HINDERING APPREHENSION OF ONESELF

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TARA ROBINSON, on or about February 26, 2017, in or about the Township of Neptune, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Hindering Apprehension of Oneself, by, with purpose to hinder her own detention, apprehension, investigation, prosecution, conviction, or punishment for the crime of, Animal Cruelty, giving false information to a law enforcement officer, contrary to the provisions of N.J.S.A. 2C:29-3b(4), and against the peace of this State, the Government, and dignity of the same.

FOURTEENTH COUNT
OBSTRUCTING THE ADMINISTRATION OF LAW
OR OTHER GOVERNMENTAL FUNCTION
FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TARA ROBINSON, on or about February 26, 2017, in or about the Township of Neptune, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Obstructing the Administration of Law or Other Governmental Function, by purposely obstructing, impairing or perverting the administration of law or other governmental function, or preventing or attempting to prevent a public servant from lawfully performing an official function by means of flight, intimidation, force, violence, or physical interference or obstacle, or by means of any independently unlawful act, thereby obstructing the detection or investigation of a crime, to wit: Animal Cruelty, contrary to the provisions of N.J.S.A. 2C:29-1, and against the peace of this State, the Government, and dignity of the same.


LORI LINSKEY
FIRST ASSISTANT
PROSECUTOR

Endorsed:

Foreperson