

Department of Law, Criminal Division
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1 IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
2 FIRST JUDICIAL DISTRICT AT JUNEAU

3 STATE OF ALASKA,

4 Plaintiff,

5 vs.

6 SALLY JEAN T BROWN

7 DOB: 06/06/1985

8 APSIN ID: 7008062

9 DMV NO.: [REDACTED]

10 ATN: 116166078

11 Defendant.

**THIS MATTER IS FORMALLY
ASSIGNED TO
LOUIS J. MENENDEZ
SUPERIOR COURT JUDGE**

12 No. 1JU-18-00303CR (Sally Jean T Brown)

13 INDICTMENT

14 I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2)
15 residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a
16 crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court.
The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: NONE

17 Count I - AS 11.71.030(a)(1)(C)

18 Misconduct Involving a Controlled Substance in the Second Degree

19 Sally Jean T Brown - 001

20 Count II - AS 11.71.030(a)(1)(A)

21 Misconduct Involving a Controlled Substance in the Second Degree

22 Sally Jean T Brown - 002

23 THE GRAND JURY CHARGES:

24
25 **COUNT I:**

26 That in the First Judicial District, State of Alaska, on or about April 5, 2018, at
27 or near Juneau, SALLY JEAN T BROWN knowingly possessed with intent to

1 manufacture or deliver one or more preparations, compounds, mixtures, or substances of
2 an aggregate weight of 2.5 grams or more containing a schedule IIA controlled substance,
3 to wit: methamphetamines.

4 All of which is class B felony offense being contrary to and in violation of
5 AS11.71.030(a)(1)(C) and against the peace and dignity of the State of Alaska.

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COUNT II:

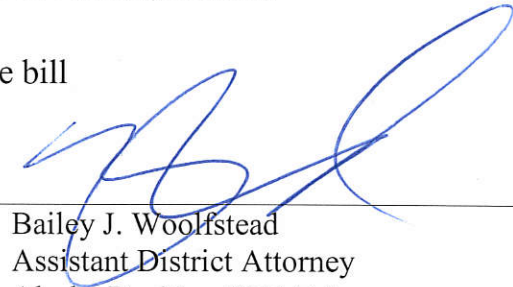
That in the First Judicial District, State of Alaska, on or about April 5, 2018, at or
near Juneau, SALLY JEAN T BROWN knowingly possessed with intent to manufacture or
deliver one or more preparations, compounds, mixtures, or substances of an aggregate weight of
one gram or more containing a schedule IA controlled substance, to wit: heroin.

All of which is class B felony offense being contrary to and in violation of
11.71.030(a)(1)(A) and against the peace and dignity of the State of Alaska.

DATED this 12 day of April, 2018 at Juneau, Alaska.

A true bill


Grand Jury Foreperson


Bailey J. Woolfstead
Assistant District Attorney
Alaska Bar No. 1211119

WITNESSES EXAMINED BEFORE THE GRAND JURY:

Jeff Brink

Search Warrant No. 1JU-18-101CR

IN THE DISTRICT COURT FOR THE STATE OF ALASKA
FIRST JUDICIAL DISTRICT AT JUNEAU

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STATE OF ALASKA

Plaintiff,

vs.

SallyJean Toutuk Brown

DOB: 06/06/1985

APSIN ID: 7008062

DMV NO: [REDACTED] STATE: AK CDL

ATN: 116166078

Defendant.

Felony
Criminal Complaint
No. 1JU-18-0303-CR

2018 APR -6 AM 9:11

VRA Certification: I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court.

DV Related per AS 18.66.990(3) and (5) All None Specified Below
Count: 1 Charge: Misconduct Involving a Controlled
Substance 2nd degree

Related Search Warrants
1JU 18-101 SW

Motor Vehicle Used in Commission of Offense – AS 28.15.181(a)
If Traffic Offense: Highway Work Zone Traffic Safety Corridor Hazardous Materials
Commercial Vehicle? Yes No If Yes, type: >26,000 lbs. >15 passengers

The District Attorney Charges:

Case Number: 180405-007

Count 1
AS 11.71.030(a)(1)(C)
Misconduct Involving a Controlled Substance 2nd Degree
CTN 001

That on or about April 5, 2018, at or near Juneau, in the First Judicial District, State of Alaska, SallyJean Toutuk Brown did possess more than 2.5 grams, of a schedule IIA controlled substance, namely methamphetamines, with intent to deliver. All of which is a Class B Felony offense being contrary to and in violation of AS 11.71.030(a)(1)(C) and against the peace and dignity of the State of Alaska.

Juneau Police Department
6255 Alaway Ave Juneau, AK. 99801
Phone: (907) 586-0600 Fax: (907) 463-4808
Email: Records@Juneaupolice.com

Count 2
AS 11.71.030(a)(1)(A)
Misconduct Involving a Controlled Substance 2nd Degree
CTN 002

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3 That on or about April 5, 2018, at or near Juneau, in the First Judicial District, State of Alaska,
4 SallyJean Toutuk Brown did possess more than 1 gram, of a schedule IA controlled substance,
5 namely heroin, with intent to deliver. All of which is a Class B Felony offense being contrary to
6 and in violation of AS 11.71.030(a)(1)(A) and against the peace and dignity of the State of
7 Alaska.

8
9 This complaint is based on the observation and written report of Detective Jeff Brink of the
10 Juneau Police Department, which states, to wit:

11 On 04/05/18, JPD received an anonymous report that SallyJean T. Brown would be flying into
12 Juneau on flight 75.

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14 On 04/05/18, Brown was contacted as she arrived on flight 75 in Juneau. Based off information
15 obtained prior to and while speaking to Brown, I obtained a search warrant of Browns' person
16 and carryon luggage. Brown produced from her waistband area, 12 ping pong ball sized balloons
17 weighing 250 gross grams. Brown later produced 13 ping pong ball sized balloons from her
18 vagina and anal cavity weighing 203 gross grams.

19 In total, Brown imported 82 gross grams of heroin and 276 gross grams of methamphetamines
20 into Juneau. Both substances field tested presumptive for their respective substance.

21
22 Based off my training and experience, 276 gross grams of methamphetamines and 82 gross
23 grams of heroin is far beyond a personal use amount. Based on current prices in Juneau, 276
24 gross grams of methamphetamines could fetch about \$27,000. 82 gross grams of heroin could
25 fetch about \$41,000.

26 Finally, Brown stated she brought the controlled substances to Juneau to sell.
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Date

Complainant's Signature

Type or Print Name and Title

Subscribed and sworn to or affirmed before me at _____, Alaska, on _____.

Notary Public or other person authorized to
administer oaths.

(SEAL)

OR

Under AS 09.63.020 a notary is unavailable and I certify under penalty of Perjury that the foregoing is true on April 5, 2018, in Juneau Alaska.

Detective Jeff Brink

Complainant's Printed Name

Brink

Complainant's Signature

**THIS MATTER IS FORMALLY
ASSIGNED TO
THOMAS G. NAVE
DISTRICT COURT JUDGE**