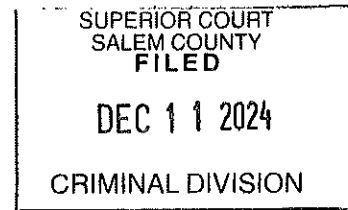


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W-2024-000109-1715



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THE STATE OF NEW JERSEY

NOVEMBER SESSION
2024 TERM

Plaintiff,

vs.

INDICTMENT NO. 24-12-00400-I

SEAN M. HIGGINS

Defendant

Reckless Vehicular Homicide – Second
Degree (Two Counts)
Aggravated Manslaughter – First Degree
(Two Counts)
Tampering with Physical Evidence – Fourth
Degree
Leaving the Scene of a Fatal Accident –
Second Degree

THE GRAND JURORS, of the State of New Jersey, for the County of SALEM, upon their oaths and affirmations, present that on or about the 29th day of August 2024, in the Township of OLDMANS, in the county aforesaid, and within the jurisdiction of this Court, SEAN M. HIGGINS did drive a vehicle recklessly in violation of R.S. 39:4-50, Driving While Intoxicated and thereby caused the death of Matthew Gaudreau, contrary to the provisions of N.J.S.A. 2C:11-5a, against the peace of this State, the Government and dignity of the same.

SECOND COUNT

On or about the 29th day of August 2024, in the Township of OLDMANS, in the county aforesaid, and within the jurisdiction of this Court, SEAN M. HIGGINS did drive a vehicle recklessly in violation of R.S. 39:4-50, Driving While Intoxicated and thereby caused the death

of John Gaudreau, contrary to the provisions of N.J.S.A. 2C:11-5a, against the peace of this State, the Government and dignity of the same.

THIRD COUNT

On or about the 29th day of August 2024, in the Township of OLDMANS, in the county aforesaid, and within the jurisdiction of this Court, SEAN M. HIGGINS did commit aggravated manslaughter by recklessly causing the death of Matthew Gaudreau under circumstances manifesting extreme indifference to human life, contrary to the provisions of N.J.S.A. 2C:11-4a(1), against the peace of this State, the Government and dignity of the same.

FOURTH COUNT

On or about the 29th day of August 2024, in the Township of OLDMANS, in the county aforesaid, and within the jurisdiction of this Court, SEAN M. HIGGINS did commit aggravated manslaughter by recklessly causing the death of John Gaudreau under circumstances manifesting extreme indifference to human life, contrary to the provisions of N.J.S.A. 2C:11-4a(1), against the peace of this State, the Government and dignity of the same.

FIFTH COUNT


On or about the 29th day of August 2024, in the Township of OLDMANS, in the county aforesaid, and within the jurisdiction of this Court, SEAN M. HIGGINS believing that an official proceeding or investigation is pending or about to be instituted, knowingly did alter, destroy, conceal or remove any article, object, record, document or other thing of physical substance 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), against the peace of this State, the Government and dignity of the same.

SIXTH COUNT

On or about the 29th day of August 2024, in the Township of OLDMANS, in the county aforesaid, and within the jurisdiction of this Court, SEAN M. HIGGINS while knowing he was involved in a motor vehicle accident, did leave the scene of said accident under circumstances that violates the provisions of R.S. 39:4-129 and the accident resulted in the deaths of Matthew Gaudreau and John Gaudreau, contrary to the provisions of N.J.S.A. 2C:11-5.1, against the

peace of this State, the Government and dignity of the same.

A True Bill Returned


Foreperson

Michael Mestern
Salem County Prosecutor

Receipt of copy of the within indictment before entry of plea is acknowledged pursuant to
Rule 3:5-1

Defendant