


\*\*\*\* DCJS 1020 FOR INDICTMENT \*\*\*\*

INDICTMENT

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF KINGS

THE PEOPLE OF THE STATE OF NEW YORK  
AGAINST

VIGNENDRA ARIYARAJAH &  


INDICTMENT NO.  
319-2019  
SUPERSEDES NO.  
10611-2016  
GREEN ZONE  
SPECIAL VICTIMS  
BUREAU

MANSLAUGHTER IN THE FIRST DEGREE  
AFO: N SEX CRIME: NA

MANSLAUGHTER IN THE SECOND DEGREE  
AFO: N SEX CRIME: NA

ASSAULT IN THE FIRST DEGREE (4 COUNTS)  
AFO: N SEX CRIME: NA

ASSAULT IN THE SECOND DEGREE (2 COUNTS)  
AFO: N SEX CRIME: NA

RECKLESS ENDANGERMENT IN THE FIRST DEGREE  
AFO: N SEX CRIME: NA


UNLAWFUL IMPRISONMENT IN THE FIRST DEGREE  
AFO: N SEX CRIME: NA

CONSPIRACY IN THE FIFTH DEGREE (2 COUNTS)  
AFO: N SEX CRIME: NA

ENDANGERING THE WELFARE OF A CHILD  
AFO: N SEX CRIME: NA

2019/MAR 21 PM 3:23

A TRUE BILL

  
FOREPERSON

ERIC GONZALEZ  
DISTRICT ATTORNEY

COUNT ONE

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Manslaughter in the First Degree [P.L. § 125.20 (1)], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, with intent to cause serious physical injury to Paul Marie Raymond, caused the death of a third person, namely, Infant Boy Raymond.

COUNT TWO

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Manslaughter in the Second Degree [P.L. § 125.15 (1)], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, recklessly caused the death of another person, namely, Infant Boy Raymond.

COUNT THREE

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Assault in the First Degree [P.L. § 120.10 (3)], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person, namely, Paul Marie Raymond, and thereby caused serious physical injury to that person.

COUNT FOUR

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Assault in the First Degree [P.L. § 120.10 (4)], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, in the course of and in furtherance of the commission or attempted commission of a felony, namely, Unlawful Imprisonment in the First Degree [P.L. § 135.10] as charged in Count Twelve of this indictment, or of immediate flight therefrom, caused serious

physical injury to a person other than one of the participants, namely, Paul Marie Raymond.

COUNT FIVE

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Assault in the First Degree [P.L. § 120.10 (4)], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, in the course of and in furtherance of the commission or attempted commission of a felony, namely, Unlawful Imprisonment in the First Degree [P.L. § 135.10] as charged in Count Twelve of this indictment, or of immediate flight therefrom, caused serious physical injury to a person other than one of the participants, namely, Infant Boy Raymond.

COUNT SIX

The Grand Jury of the County of Kings, by this indictment, accuses the defendant, Vignendra Ariyarajah, of the crime of Assault in the First Degree [P.L. § 120.10 (4)], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendant, in the course of and in furtherance of the commission or attempted commission of a felony, namely, Assault in the Second Degree [P.L. § 120.05 (5)] as charged in Count Nine of this indictment, or of immediate flight therefrom, caused serious physical injury to a person other than one of the participants, namely, Infant Boy Raymond.

COUNT SEVEN

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Conspiracy in the Fifth Degree [P.L. § 105.05], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, did with intent that conduct constituting a felony, namely, Assault in the Second Degree [P.L. § 120.05(1)], be performed, agreed with one or more persons to engage in or cause the performance of such conduct.

OVERT ACTS

- (1) On or about December 21, 2016, in the evening hours, St. Jean Nazairre, an unindicted co-conspirator and defendant Vignendra Ariyarajah drove Confidential Witness One to 1012 Ocean Avenue in Brooklyn, New York.
- (2) On or about December 21, 2016, after arriving at 1012 Ocean Avenue in Brooklyn, defendant Vignendra Ariyarajah escorted Confidential Witness One to apartment 4C and introduced her to Paul Marie Raymond, who was lying on a sheet on the floor, semi-comatose, moaning, and covered in vomit.
- (3) On or about December 21, 2016, in the evening hours, defendant Vignendra Ariyarajah left apartment 4C at 1012 Ocean Avenue momentarily, and returned with a large syringe, which he instructed Confidential Witness One to use to administer water and juice to Paul Marie Raymond.
- (4) On or about December 21, 2016, in the evening hours, defendant Vignendra Ariyarajah told Confidential Witness One that Paul Marie Raymond should be given small amounts of water and juice to drink and should not be given any food.
- (5) On or about December 22, 2016, at approximately 6:36 p.m., St. Jean Nazairre sent a text message to defendant Bridgett Singh stating: "1. When giving soup tonight, same thing...1 or 2 more crushed pills. 2. Ask her to gauge moaning, i.e. is it less, 3. Sleep wake cycles, 4. Urine output, 5. Need feedback if she is clearing tonight or tomorrow a.m. i.e. more sensible, more alert..." On or about December 22, 2016, at approximately 6:36 p.m. St. Jean Nazairre, an unindicted co-conspirator sent a follow-up text message to defendant Bridgett Singh stating: "From Dr. Vic."
- (6) On or about December 22, 2016, at approximately 8:12 p.m., defendant Vignendra Ariyarajah sent a text message to defendant Brigette Singh stating: "Please ask SPECIFIC questions to the aide to ensure there is progress. I want to see that PM is more alert, groaning less, talking more, complete sentences, appears less intoxicated, more sensible... also puking less blood."
- (7) On or about December 22, 2016, at approximately 8:13 p.m., defendant Vignendra Ariyarajah sent a

text message to defendant Bridgette Singh stating:  
"Ensure she is not in shock i.e. hands and feet not  
cold and clammy, no dusky color."

- (8) On or about December 23, 2016 at approximately 10:59 a.m., defendant Vignendra Ariyarajah sent a text message to defendant Bridgette Singh stating: "Empty ½ or 2/3 from the bottles on the dresser (without anyone noticing)."
- (9) On or about December 24, 2016, after defendant Bridgett Singh had called 911, summoning an ambulance, at approximately 11:08 a.m., defendant Vignendra Ariyarajah placed two telephone calls to defendant Bridgett Singh at approximately 11:15 a.m. and 11:16 a.m.
- (10) On or about December 24, 2016, after defendant at approximately 11:18 a.m., defendant Bridgett Singh called 911 and attempted to cancel the request for an ambulance, stating, "Doctor said it was okay to cancel."
- (11) On or about December 24, 2016, at approximately 11:34 a.m., defendant Bridgett Singh attempted to prevent emergency medical technicians from entering apartment 4C and rendering medical assistance to Paul Marie Raymond and Infant Boy Raymond.

#### COUNT EIGHT

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Assault in the Second Degree [P.L. § 120.05(1)], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, with intent to cause serious physical injury to Paul Marie Raymond, caused such injury to Paul Marie Raymond.

#### COUNT NINE

The Grand Jury of the County of Kings, by this indictment, accuses the defendant, Vignendra Ariyarajah, of the crime of Assault in the Second Degree [P.L. § 120.05 (5)], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendant acting with other persons, for a purpose other than lawful medical or therapeutic treatment, intentionally caused stupor, unconsciousness, or other physical impairment or injury to another person, namely, Paul Marie Raymond, by administering to

her, without her consent, a drug, substance, or preparation capable of producing the same, namely, phencyclidine and/or lorazepam.

#### COUNT TEN

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Reckless Endangerment in the First Degree [P.L. § 120.25], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person, namely, Paul Marie Raymond.

#### COUNT ELEVEN

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Conspiracy in the Fifth Degree [P.L. § 105.05], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, did with intent that conduct constituting a felony, namely, Unlawful Imprisonment in the First Degree [P.L. § 135.10], be performed, agreed with one or more persons to engage in or cause the performance of such conduct.

#### OVERT ACTS

- (1) On or about December 21, 2016, in the evening hours, St. Jean Nazairre, an unindicted co-conspirator asked Confidential Witness One who was visiting from Haiti to watch his friend's girlfriend who was sick, as the friend was leaving for vacation with his wife and needed someone to take care of his sick girlfriend.
- (2) On or about December 21, 2016, in the evening hours, the defendant Vignendra Ariyarajah instructed Confidential Witness One to not let Paul Marie Raymond leave the apartment under any circumstances, and to not allow her to have any contact with any friends or family by phone.

- (3) On or about December 23, 2016, at approximately 11:58 p.m., Paul Marie Raymond ran out of 1012 Ocean Avenue, apartment 4C, and down to the street. Defendant Vignendra Ariyarajah then sent a text message to defendant Bridgette Singh stating, "1. NEVER, NEVER, NEVER forget to take keys when you leave apartment. 2. If she runs out of house, you MUST FOLLOW HER. What that aid did was just plain silly....CANNOT leave her outside on her own!!@!!"
- (4) On or about December 23, 2016, after Paul Marie Raymond ran out of Apartment 4C, Defendant Bridgett Singh brought Paul Marie Raymond back to that apartment and administered medication to her which, Defendant Vignendra Ariyarajah stated would calm Paul Marie Raymond down, so that she would not attempt to flee again.
- (5) On or about December 24, 2016, at approximately 11:15 a.m. and 11:16 a.m. defendant Vignendra Ariyarajah placed two telephone calls to defendant Bridgette Singh after Bridgett Singh called 911 for an ambulance for Paul Marie Raymond who was in labor. On or about December 24, 2016, at approximately 11:18 a.m., defendant Bridgette Singh called 911 and attempted to cancel her request for an ambulance, stating "Dr. said I could cancel."
- (6) On or about December 24, 2016, at approximately 11:20 a.m., defendant Bridgette Singh called 911 and again attempted to cancel her request for an ambulance.
- (7) On or about December 24, 2016, at approximately 11:34 a.m., defendant Bridgett Singh attempted to block the Emergency Medical Technicians from entering the apartment in order to take Paul Marie Raymond to the hospital.

COUNT TWELVE

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Unlawful Imprisonment in the First Degree [P.L. § 135.10], committed as follows:

On or about and between December 7, 2016 through and including December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, unlawfully restrained another person, namely, Paul Marie Raymond, under circumstances which exposed her to a risk of serious physical injury.

COUNT THIRTEEN

The Grand Jury of the County of Kings, by this indictment, accuses the defendants, Vignendra Ariyarajah and Bridgett Singh, of the crime of Endangering the Welfare of a Child [P.L. § 260.10(1)], committed as follows:

On or about December 24, 2016, in the County of Kings, State of New York, the defendants, each aiding the other and acting in concert with other persons, knowingly acted in a manner likely to be injurious to the physical, mental, or moral welfare of a child less than seventeen years of age, namely, Infant Boy Raymond.

ERIC GONZALEZ

DISTRICT ATTORNEY

*Eric Gonzalez*



## SERVICE OF PRE-TRIAL MOTIONS BY DEFENDANT

TO DEFENDANT:

PLEASE TAKE NOTICE that pursuant to C.P.L. Article 225, defendant (s) must ordinarily make all pre-trial motions within forty-five days after arraignment and before commencement of trial. Upon expiration of the applicable period within which defendant must make pre-trial motions, the People will move the Court to preclude any pre-trial motions made thereafter.

Sincerely,

ERIC GONZALEZ  
District Attorney  
Kings County