

SUPERIOR COURT OF N.J.  
FILED

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*Christian P. Higgins*  
Acting Clerk

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ556-08-12  
Superior Court  
Docket Number 08-05-00084-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

JOEL G. JUAREZ )  
also known as )  
ENRIQUE H. PENNA )

DAMIAN C. GARCIA )  
also known as )  
DAMIAN CONSTANTINO )

BALTAZAR G. CONSTANTINO )

LUIS A. DEJESUS )

and )

LEONARDO R. DEJESUS )

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

COUNT ONE

(Conspiracy - Second Degree)

JOEL G. JUAREZ

DAMIAN C. GARCIA

BALTAZAR G. CONSTANTINO

LUIS A. DEJESUS

and

LEONARDO R. DEJESUS

between on or about June 20, 2007, and on or about July 13, 2007, at the Borough of Folsom and at the Town of Hammonton, both in the County of Atlantic, at the Township of Pilesgrove, in the County of Salem, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of distribution of a controlled dangerous substance, possession with intent to distribute a controlled dangerous substance, and money laundering, did agree together and with a person whose identity is known to the Grand Jurors, who at all times relevant to this indictment was an agent of the New Jersey State Police, 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 or purposely to distribute a controlled dangerous substance, that is, cocaine, in a quantity of five ounces or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(1).

2. Knowingly or purposely to possess with intent to distribute a controlled dangerous substance, that is, cocaine, in a quantity of five ounces or more including any adulterants or

dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(1).

3. Knowingly or purposely to distribute a controlled dangerous substance, that is, marijuana, in a quantity of twenty-five pounds or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(10) (a).

4. Knowingly or purposely to possess with intent to distribute a controlled dangerous substance, that is, marijuana, in a quantity of twenty-five pounds or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(10) (a).

5. Knowingly to engage in a transaction involving property known to be derived from criminal activity or which a reasonable person would believe to be derived from criminal activity, including the unlawful possession, possession with intent to distribute, and distribution of controlled dangerous substances, the aforesaid property being approximately \$47,000 in U.S. currency, with the intent to facilitate or promote the criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b.

The Grand Jurors aforesaid, upon their oaths, do further present that in furtherance of the said conspiracy, the following Overt Acts, among others were committed:

1. On or about July 13, 2007, at the Borough of Folsom, in the County of Atlantic, JOEL JUAREZ did rent a room at the Budget Motel, 37 East Blackhorse Pike, Folsom, New Jersey, to be utilized for a meeting place at which the distribution of controlled dangerous substances would take place.

2. On or about July 13, 2007, at the Borough of Folsom, in the County of Atlantic, JOEL JUAREZ, DAMIAN GARCIA, and BALTAZAR CONSTANTINO, did meet at the Budget Motel, 37 East Blackhorse Pike, Folsom, New Jersey, for the purpose of discussing and consummating the distribution of controlled dangerous substances.

3. On or about July 13, 2007, at the Borough of Folsom, in the County of Atlantic, JOEL JUAREZ and DAMIAN GARCIA did bring LUIS DEJESUS and LEONARDO DEJESUS to the Budget Motel, 37 East Blackhorse Pike, Folsom, New Jersey, in order to consummate the distribution of controlled dangerous substances.

4. On or about July 13, 2007, at the Borough of Folsom, in the County of Atlantic, LUIS DEJESUS and LEONARDO DEJESUS did possess \$47,000 in U.S. currency, which was to be utilized to consummate the distribution of controlled dangerous substances.

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.