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NOV 07 2011

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

FILED

DEC 05 2011

State Grand Jury

State Grand Jury Judge

Number SGJ611-11-5

Superior Court

Docket Number 11 - 11 - 00144 - S

STATE OF NEW JERSEY)

v.)

INDICTMENT

ANNE MARIE MANFREDONIA)

HILDELBERTO SALINAS)

ABRAHAM CHALI,)
AKA CARLOS JACOBO)

MIGUEL G. SACOTO,)

MEVLAN LITA,)
AKA ARBEN LITA)

(JUAN) PABLO GAVILANEZ)

JOSE PELAEZ)

GUSTAVO POMAVILLA)

ROBERTO YUMBLA)

ANA ALTAMIRANO)

ARIOLFO ALTAMIRANO)

LUZ ALVAREZ)

OMAR AVILA)

CLAUDIO ANGAMARCA)

AURELIO AJU-CHITIC)

and)

SANDRA AVENDANO-MARIN)

The Grand Jurors of and for the State of New Jersey, upon

their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

ANNE MARIE MANFREDONIA

HILDELBERTO SALINAS

ABRAHAM CHALI

MIGUEL G. SACOTO

MEVLAN LITA

(JUAN) PABLO GAVILANEZ

JOSE PELAEZ

GUSTAVO POMAVILLA

ROBERTO YUMBLA

ANA ALTAMIRANO

ARIOLFO ALTAMIRANO

LUZ ALVAREZ

OMAR AVILA

CLAUDIO ANGAMARCA

AURELIO AJU-CHITIC

and

SANDRA AVENDANO-MARIN

who are named as defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about May 29, 2009, and on or about December 15,

2010, at the Borough of Lodi, in the County of Bergen, elsewhere, and within the jurisdiction of the Court, with the purpose of promoting and facilitating the commission of the crimes of official misconduct, bribery, computer theft, and tampering with public records or information, did agree together and with a member of the New Jersey Division of Criminal Justice working in an undercover capacity, that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes; or

B. One or more of them knowingly would aid in the planning, attempt, solicitation or commission of the said crimes, that is:

1. Knowingly commit an act relating to the office of a public servant but constituting an unauthorized exercise of said public servant's official functions, knowing that such act was unauthorized or was being committed in an unauthorized manner, or knowingly to refrain from performing a duty which is imposed upon said public servant by law or which is clearly inherent in the nature of the public office, with purpose to obtain a benefit for the public servant or another, contrary to the provisions of N.J.S.A. 2C:30-2.

2. Knowingly directly or indirectly offer, confer or agree to confer upon another, or solicit, accept or agree to accept from another, any benefit as consideration for a

violation of an official duty of a public servant, or any benefit as consideration for the performance of an official duty of a public servant, contrary to the provisions of N.J.S.A. 2C:27-2c and N.J.S.A. 2C:27-2d.

3. Purposely or knowingly, without authorization or in excess of authorization, alter the New Jersey Motor Vehicle Commission data base or other computer storage medium, contrary to the provisions of N.J.S.A. 2C:20-25.

4. With purpose to defraud the New Jersey Motor Vehicle Commission, make, present, offer for filing, or use any record, document or thing, knowing it to be false, and with purpose that it be taken as a genuine part of any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, contrary to the provisions of N.J.S.A. 2C:28-7a(2).

The Grand Jurors aforesaid, upon their oaths, do further present that:

It was part of the said conspiracy that ANNE MARIE MANFREDONIA, a Customer Service Representative for the New Jersey Motor Vehicle Commission, did accept money in exchange for the improper issuance of New Jersey Motor Vehicle Commission identification documents, including driver's licenses.

It was part of the said conspiracy that HILDELBERTO SALINAS did recruit individuals who could not legitimately obtain New Jersey Motor Vehicle Commission identification documents, including driver's licenses, accept money from these individuals, and arrange for these individuals to obtain New Jersey Motor Vehicle Commission identification documents, including driver's licenses, from ANNE MARIE MANFREDONIA.

It was part of the said conspiracy that ABRAHAM CHALI, MIGUEL G. SACOTO, MEVLAN LITA, (JUAN) PABLO GAVILANEZ, JOSE PELAEZ, GUSTAVO POMAVILLA, ROBERTO YUMBLA, ANA ALTAMIRANO, ARIOLFO ALTAMIRANO, LUZ ALVAREZ, OMAR AVILA, CLAUDIO ANGAMARCA, AURELIO AJU-CHITIC, and SANDRA AVENDANO-MARIN, did give money to HILDELBERTO SALINAS and ANNE MARIE MANFREDONIA in exchange for the improper issuance of New Jersey Motor Vehicle Commission identification documents, including driver's licenses.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Pattern of Official Misconduct - Second Degree)

ANNE MARIE MANFREDONIA

between on or about May 29, 2009, and on or about December 15, 2010, at the Borough of Lodi, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, did commit the offense of Pattern of Official Misconduct in that she did commit two or more acts of Official Misconduct, each in violation of N.J.S.A. 2C:30-2, that is, the said ANNE MARIE MANFREDONIA, then and there being a public servant, to wit: a Customer Service Representative with the New Jersey Motor Vehicle Commission, Lodi Agency, having thereby the official functions and duties, among others, to verify that individuals applying for New Jersey driver's licenses are thereby authorized to receive said licenses, to process and issue New Jersey Motor Vehicle Commission Digital driver's licenses, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did commit two or more acts of Official Misconduct, at least one of which was a crime of the second degree, including but not limited to those acts described in Counts Three through Seventeen, which allegations are incorporated by reference as if fully set forth herein, contrary to the provisions of N.J.S.A. 2C:30-7, N.J.S.A. 2C:2-6, and

against the peace of this State, the government and dignity of
the same.

COUNTS THREE THROUGH SEVENTEEN

(Official Misconduct - Second Degree)

ANNE MARIE MANFREDONIA

HILDELBERTO SALINAS

ABRAHAM CHALI

MIGUEL G. SACOTO

MEVLAN LITA

(JUAN) PABLO GAVILANEZ

JOSE PELAEZ

GUSTAVO POMAVILLA

ROBERTO YUMBLA

ANA ALTAMIRANO

ARIOLFO ALTAMIRANO

LUZ ALVAREZ

OMAR AVILA

CLAUDIO ANGAMARCA

AURELIO AJU-CHITIC

and

SANDRA AVENDANO-MARIN

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said ANNE MARIE MANFREDONIA, being a public servant, that is, a Customer Service Representative for the New Jersey Motor Vehicle Commission, Lodi

Agency, and acting with purpose to obtain a benefit for herself or another or to injure or to deprive another of a benefit, did commit an act or acts relating to her office, but constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon her by law or clearly inherent in the nature of her office, that is, the said ANNE MARIE MANFREDONIA, while employed by the New Jersey Motor Vehicle Commission, Lodi Agency, thereby performing a governmental function, having thereby the official functions and duties, among others, to verify that individuals applying for New Jersey driver's licenses are thereby authorized to receive said licenses, to process and issue New Jersey Motor Vehicle Commission Digital driver's licenses, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did, with purpose to secure a benefit for herself or another, process or issue New Jersey Motor Vehicle Commission identification documents, including driver's licenses, to HILDELBERTO SALINAS, ABRAHAM CHALI, MIGUEL G. SACOTO, MEVLAN LITA, (JUAN) PABLO GAVILANEZ, JOSE PELAEZ, GUSTAVO POMAVILLA, ROBERTO YUMBLA, ANA ALTAMIRANO, ARIOLFO ALTAMIRANO, LUZ ALVAREZ, OMAR AVILA, CLAUDIO ANGAMARCA, AURELIO AJU-CHITIC, SANDRA AVENDANO-MARIN, and a member of the New Jersey Division of

Criminal Justice who at all times relevant to this Indictment was working in an undercover capacity, without obtaining or receiving the proper documentation for same for the benefit of herself and others, all as set forth herein:

Count	Defendant(s)	Date(s)	Municipality/ County
3	ANNE MARIE MANFREDONIA and HILDELBERTO SALINAS	12/6/2010 and 12/7/2010	Borough of Lodi, County of Bergen
4	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ABRAHAM CHALI	12/4/2010	Borough of Lodi, County of Bergen
5	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and MIGUEL G. SACOTO	11/16/2010	Borough of Lodi, County of Bergen
6	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and MEVLAN LITA	10/19/2010	Borough of Lodi, County of Bergen
7	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and (JUAN) PABLO GAVILANEZ	9/7/2010	Borough of Lodi, County of Bergen
8	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and JOSÉ PELAEZ	7/24/2010	Borough of Lodi, County of Bergen
9	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and GUSTAVO POMAVILLA	7/9/2010	Borough of Lodi, County of Bergen
10	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ROBERTO YUMBLA	7/9/2010	Borough of Lodi, County of Bergen

Count	Defendant (s)	Date (s)	Municipality/ County
11	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ANA ALTAMIRANO	6/26/2010	Borough of Lodi, County of Bergen
12	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ARIOLFO ALTAMIRANO	6/19/2010	Borough of Lodi, County of Bergen
13	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and LUZ ALVAREZ	2/25/2010	Borough of Lodi, County of Bergen
14	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and OMAR AVILA	12/12/2009	Borough of Lodi, County of Bergen
15	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and CLAUDIO ANGAMARCA	9/26/2009	Borough of Lodi, County of Bergen
16	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and AURELIO AJU-CHITIC	7/10/2009	Borough of Lodi, County of Bergen
17	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and SANDRA AVENDANO-MARIN	5/29/2009	Borough of Lodi, County of Bergen

contrary to the provisions of N.J.S.A. 2C:30-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNTS EIGHTEEN THROUGH THIRTY-TWO

(Bribery in Official Matters - Second Degree)

ANNE MARIE MANFREDONIA

HILDELBERTO SALINAS

ABRAHAM CHALI

MIGUEL G. SACOTO

MEVLAN LITA

(JUAN) PABLO GAVILANEZ

JOSE PELAEZ

GUSTAVO POMAVILLA

ROBERTO YUMBLA

ANA ALTAMIRANO

ARIOLFO ALTAMIRANO

LUZ ALVAREZ

OMAR AVILA

CLAUDIO ANGAMARCA

AURELIO AJU-CHITIC

and

SANDRA AVENDANO-MARIN

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer or agree to confer upon another, or solicited, accepted or agreed to accept from another, a benefit in excess of \$200.00, as consideration for the violation of an

official duty of a public servant or for the performance of an official duty of a public servant, that is, said ANNE MARIE MANFREDONIA, being a Customer Service Representative for the New Jersey Motor Vehicle Commission, Lodi Agency, accepted money in excess of \$200 from HILDELBERTO SALINAS, ABRAHAM CHALI, MIGUEL G. SACOTO, MEVLAN LITA, (JUAN) PABLO GAVILANEZ, JOSE PELAEZ, GUSTAVO POMAVILLA, ROBERTO YUMBLA, ANA ALTAMIRANO, ARIOLFO ALTAMIRANO, LUZ ALVAREZ, OMAR AVILA, CLAUDIO ANGAMARCA, AURELIO AJU-CHITIC, SANDRA AVENDANO-MARIN, and a member of the New Jersey Division of Criminal Justice who at all times relevant to this Indictment was working in an undercover capacity, in exchange for the improper issuance of New Jersey Motor Vehicle Commission identification documents, including driver's licenses, all as set forth herein:

Count	Defendant(s)	Date(s)	Municipality/ County
18	ANNE MARIE MANFREDONIA and HILDELBERTO SALINAS	12/6/2010 and 12/7/2010	Borough of Lodi, County of Bergen
19	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ABRAHAM CHALI	12/4/2010	Borough of Lodi, County of Bergen
20	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and MIGUEL G. SACOTO	11/16/2010	Borough of Lodi, County of Bergen
21	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and MEVLAN LITA	10/19/2010	Borough of Lodi, County of Bergen

Count	Defendant (s)	Date (s)	Municipality/ County
22	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and (JUAN) PABLO GAVILANEZ	9/7/2010	Borough of Lodi, County of Bergen
23	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and JOSE PELAEZ	7/24/2010	Borough of Lodi, County of Bergen
24	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and GUSTAVO POMAVILLA	7/9/2010	Borough of Lodi, County of Bergen
25	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ROBERTO YUMBLA	7/9/2010	Borough of Lodi, County of Bergen
26	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ANA ALTAMIRANO	6/26/2010	Borough of Lodi, County of Bergen
27	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ARIOLFO ALTAMIRANO	6/19/2010	Borough of Lodi, County of Bergen
28	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and LUZ ALVAREZ	2/25/2010	Borough of Lodi, County of Bergen
29	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and OMAR AVILA	12/12/2009	Borough of Lodi, County of Bergen
30	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and CLAUDIO ANGAMARCA	9/26/2009	Borough of Lodi, County of Bergen
31	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and AURELIO AJU-CHITIC	7/10/2009	Borough of Lodi, County of Bergen

Count	Defendant(s)	Date(s)	Municipality/ County
32	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and SANDRA AVENDANO-MARIN	5/29/2009	Borough of Lodi, County of Bergen

contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNTS THIRTY-THREE THROUGH FORTY-SEVEN

(Computer Theft - Second Degree)

ANNE MARIE MANFREDONIA

HILDELBERTO SALINAS

ABRAHAM CHALI

MIGUEL G. SACOTO

MEVLAN LITA

(JUAN) PABLO GAVILANEZ

JOSE PELAEZ

GUSTAVO POMAVILLA

ROBERTO YUMBLA

ANA ALTAMIRANO

ARIOLFO ALTAMIRANO

LUZ ALVAREZ

OMAR AVILA

CLAUDIO ANGAMARCA

AURELIO AJU-CHITIC

and

SANDRA AVENDANO-MARIN

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, purposely or knowingly and without authorization, or in excess of authorization, did alter the New Jersey Motor Vehicle Commission data base or other computer storage medium, that is, the said ANNE MARIE

MANFREDONIA, being a Customer Service Representative for the New Jersey Motor Vehicle Commission, Lodi Agency, with the assistance of HILDELBERTO SALINAS, altered the New Jersey Motor Vehicle Commission Database or other computer storage medium by entering false data that New Jersey Driver's licenses were properly issued to ABRAHAM CHALI, MIGUEL G. SACOTO, MEVLAN LITA, (JUAN) PABLO GAVILANEZ, JOSE PELAEZ, GUSTAVO POMAVILLA, ROBERTO YUMBLA, ANA ALTAMIRANO, ARIOLFO ALTAMIRANO, LUZ ALVAREZ, OMAR AVILA, CLAUDIO ANGAMARCA, AURELIO AJU-CHITIC, SANDRA AVENDANO-MARIN, and a member of the New Jersey Division of Criminal Justice who at all times relevant to this Indictment was working in an undercover capacity, all as set forth herein:

Count	Defendant(s)	Date(s)	Municipality/ County
33	ANNE MARIE MANFREDONIA and HILDELBERTO SALINAS	12/6/2010 and 12/7/2010	Borough of Lodi, County of Bergen
34	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ABRAHAM CHALI	12/4/2010	Borough of Lodi, County of Bergen
35	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and MIGUEL G. SACOTO	11/16/2010	Borough of Lodi, County of Bergen
36	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and MEVLAN LITA	10/19/2010	Borough of Lodi, County of Bergen
37	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and (JUAN) PABLO GAVILANEZ	9/7/2010	Borough of Lodi, County of Bergen

Count	Defendant (s)	Date (s)	Municipality/ County
38	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and JOSE PELAEZ	7/24/2010	Borough of Lodi, County of Bergen
39	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and GUSTAVO POMAVILLA	7/9/2010	Borough of Lodi, County of Bergen
40	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ROBERTO YUMBLA	7/9/2010	Borough of Lodi, County of Bergen
41	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ANA ALTAMIRANO	6/26/2010	Borough of Lodi, County of Bergen
42	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ARIOLFO ALTAMIRANO	6/19/2010	Borough of Lodi, County of Bergen
43	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and LUZ ALVAREZ	2/25/2010	Borough of Lodi, County of Bergen
44	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and OMAR AVILA	12/12/2009	Borough of Lodi, County of Bergen
45	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and CLAUDIO ANGAMARCA	9/26/2009	Borough of Lodi, County of Bergen
46	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and AURELIO AJU-CHITIC	7/10/2009	Borough of Lodi, County of Bergen
47	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and SANDRA AVENDANO-MARIN	5/29/2009	Borough of Lodi, County of Bergen

contrary to the provisions of N.J.S.A. 2C:20-25b, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNTS FORTY-EIGHT THROUGH SIXTY-TWO

(Tampering With Public Records or Information - Third Degree)

ANNE MARIE MANFREDONIA

HILDELBERTO SALINAS

ABRAHAM CHALI

MIGUEL G. SACOTO

MEVLAN LITA

(JUAN) PABLO GAVILANEZ

JOSE PELAEZ

GUSTAVO POMAVILLA

ROBERTO YUMBLA

ANA ALTAMIRANO

ARIOLFO ALTAMIRANO

LUZ ALVAREZ

OMAR AVILA

CLAUDIO ANGAMARCA

AURELIO AJU-CHITIC

and

SANDRA AVENDANO-MARIN

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, with the purpose to defraud or injure the New Jersey Motor Vehicle Commission, knowingly did make, present, offer for filing, or use any record, document or thing knowing it to be false, and with the purpose that it be

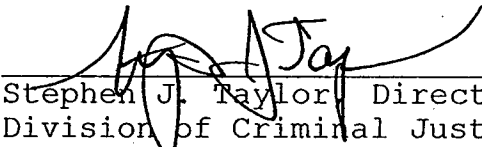
taken as a genuine part of the information or records belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said ABRAHAM CHALI, MIGUEL G. SACOTO, MEVLAN LITA, (JUAN) PABLO GAVILANEZ, JOSE PELAEZ, GUSTAVO POMAVILLA, ROBERTO YUMBLA, ANA ALTAMIRANO, ARIOLFO ALTAMIRANO, LUZ ALVAREZ, OMAR AVILA, CLAUDIO ANGAMARCA, AURELIO AJU-CHITIC, and SANDRA AVENDANO-MARIN, with the assistance of ANNE MARIE MANFREDONIA and HILDELBERTO SALINAS, did make, present, offer for filing, or use, New Jersey Motor Vehicle Commission applications for New Jersey identification documents, including driver's licenses, when such defendants were not eligible to receive such licenses or identification and without providing the proper documentation for same, which information was submitted to the New Jersey Motor Vehicle Commission, all as set forth herein:

Count	Defendant(s)	Date(s)	Municipality/ County
48	ANNE MARIE MANFREDONIA and HILDELBERTO SALINAS	12/6/2010 and 12/7/2010	Borough of Lodi, County of Bergen
49	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ABRAHAM CHALI	12/4/2010	Borough of Lodi, County of Bergen
50	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and MIGUEL G. SACOTO	11/16/2010	Borough of Lodi, County of Bergen

Count	Defendant (s)	Date (s)	Municipality/ County
51	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and MEVLAN LITA	10/19/2010	Borough of Lodi, County of Bergen
52	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and (JUAN) PABLO GAVILANEZ	9/7/2010	Borough of Lodi, County of Bergen
53	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and JOSE PELAEZ	7/24/2010	Borough of Lodi, County of Bergen
54	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and GUSTAVO POMAVILLA	7/9/2010	Borough of Lodi, County of Bergen
55	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ROBERTO YUMBLA	7/9/2010	Borough of Lodi, County of Bergen
56	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ANA ALTAMIRANO	6/26/2010	Borough of Lodi, County of Bergen
57	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and ARIOLFO ALTAMIRANO	6/19/2010	Borough of Lodi, County of Bergen
58	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and LUZ ALVAREZ	2/25/2010	Borough of Lodi, County of Bergen
59	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and OMAR AVILA	12/12/2009	Borough of Lodi, County of Bergen
60	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and CLAUDIO ANGAMARCA	9/26/2009	Borough of Lodi, County of Bergen

Count	Defendant(s)	Date(s)	Municipality/ County
61	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and AURELIO AJU-CHITIC	7/10/2009	Borough of Lodi, County of Bergen
62	ANNE MARIE MANFREDONIA, HILDELBERTO SALINAS, and SANDRA AVENDANO-MARIN	5/29/2009	Borough of Lodi, County of Bergen

contrary to the provisions of N.J.S.A. 2C:28-7a(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.


 Stephen J. Taylor, Director
 Division of Criminal Justice

A TRUE BILL:


 Foreperson

Dated: 11/7/11

RECEIVED

NOV 07 2011

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

FILED

DEC 05 2011

State Grand Jury

Number SGJ611-11-5

State Grand Jury Judge

Superior Court 11 - 11 - 00144 - S
Docket Number

STATE OF NEW JERSEY)

v.)

ANNE MARIE MANFREDONIA)

HILDELBERTO SALINAS)

ABRAHAM CHALI,)
AKA CARLOS JACOBO)

MIGUEL G. SACOTO,)

MEVLAN LITA,)
AKA ARBEN LITA)

(JUAN) PABLO GAVILANEZ)

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ROBERTO YUMBLA)

ANA ALTAMIRANO)

ARIOLFO ALTAMIRANO)

LUZ ALVAREZ)

OMAR AVILA)

CLAUDIO ANGAMARCA)

AURELIO AJU-CHITIC)

and)


SANDRA AVENDANO-MARIN)

ORDER OF VENUE

An Indictment having been returned to this Court by the State
Grand Jury in the above captioned matter,

IT IS ORDERED on this 7th day of November, 2011, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Bergen be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Bergen for filing.


Pedro J. Jimenez, Jr., J.S.C.

FILED

DEC 05 2011

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury Judge

IN THE MATTER OF)

STATE GRAND JURY INDICTMENT)

NUMBER SGJ611-11-5)

STATE OF NEW JERSEY)

v.)

ORDER TO UNSEAL INDICTMENT

ANNE MARIE MANFREDONIA)

HILDELBERTO SALINAS)

ABRAHAM CHALI,
AKA CARLOS JACOBO)

MIGUEL G. SACOTO,)

MEVLAN LITA,
AKA ARBEN LITA)

(JUAN) PABLO GAVILANEZ)

JOSE PELAEZ)

GUSTAVO POMAVILLA)

ROBERTO YUMBLA)

ANA ALTAMIRANO)

ARIOLFO ALTAMIRANO)

LUZ ALVAREZ)

OMAR AVILA)

CLAUDIO ANGAMARCA)

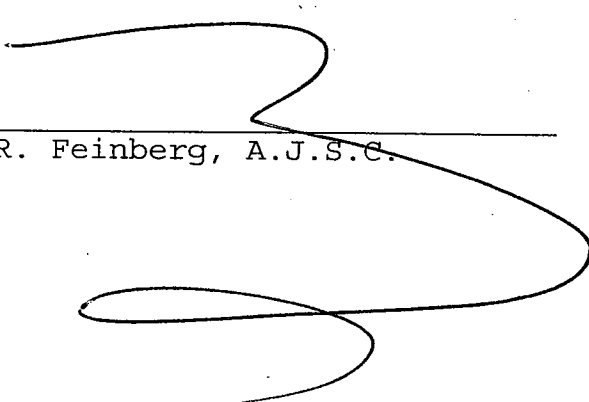
AURELIO AJU-CHITIC)

and)

SANDRA AVENDANO-MARIN)

Andrew M. Butchko, Deputy Attorney General of the State of New Jersey, having on this date made written and oral application for an order to unseal State Grand Jury Indictment Number SGJ611-11-5, and to unseal the Order of Venue designating a county of venue for the purpose of trial of the said Indictment;

IT IS HEREBY ORDERED on this 5th day of December, 2011, that the Clerk of the Superior Court unseal and release State Grand Jury Indictment Number SGJ611-11-5 and the Order of Venue designating a county of venue for the purpose of the trial of the said Indictment.



Linda R. Feinberg, A.J.S.C.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

IN THE MATTER OF)
STATE GRAND JURY INDICTMENT) VERIFIED PETITION
NUMBER SGJ611-11-5)

STATE OF NEW JERSEY)
COUNTY OF MERCER) SS.


Andrew M. Butchko, being duly sworn according to law, upon his oath, respectfully petitions the Court as follows:

1. I am a Deputy Attorney General assigned to the Division of Criminal Justice.

2. On November 7, 2011, an Indictment in the above-captioned matter was returned to this Court. On that date the said Indictment and Order of Venue designating a county of venue for the purpose of trial were sealed by Order of this Court dated November 7, 2011.


3. The investigative reasons which supported the sealing of the Indictment and order described in paragraph 2, pursuant to R.3:6-8, no longer prevail.

4. Therefore, I respectfully petition this Court to order the above-captioned Indictment and Order of Venue be unsealed and released as public documents.



Andrew M. Butchko
Deputy Attorney General
Division of Criminal Justice

Sworn and subscribed to before me
this 5th day of December, 2011.



Kelley L. Rotondo, Notary Public NJ
My commission expires May 11, 2012
(ID: #2290797)

