# FILED

FEB 22 2013

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury Judge

State Grand Jury Number <u>SGJ630-13-35</u> Superior Court Docket Number 13-02-00045-9

STATE OF NEW JERSEY	· ) ;	1:
<b>V</b> .	<b>)</b>	
VINCENT A. ESPOSITO	)	INDICTMENT
and	)	
SRINIVASA RAJU	)	

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

# COUNT ONE

(Conspiracy - Second Degree)

VINCENT A. ESPOSITO

and

## SRINIVASA RAJU

who are named as the defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not defendants herein, between on or about May 13, 2011 and on or about December 29, 2011, at the Borough of Madison, in the County of Morris, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of

distribution of a controlled dangerous substance, did agree together with other persons, whose identities are both known and unknown to the Grand Jurors, who at all times relevant to this indictment were either a confidential source for the Drug Enforcement Administration or an agent of the Drug Enforcement Administration working in an undercover capacity, that:

- A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crime, or
- B. One or more of them knowingly would aid in the planning, solicitation, or commission of said crime, that is:

Knowingly or purposely to distribute a controlled dangerous substance, Oxycodone, a Schedule II Controlled Dangerous Substance, in a quantity of at least one ounce or more, including any adulterants and dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(4).

All in violation of N.J.S.A. 2C:5-2, N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

### COUNT TWO

(Distribution of a Controlled Dangerous Substance--Second Degree)

#### SRINIVASA RAJU

between on or about May 13, 2011 and on or about August 19, 2011, at the Borough of Madison, in the County of Morris, elsewhere, and within the jurisdiction of this Court, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute controlled dangerous substances, Oxycodone, a Schedule II controlled dangerous substance, in a quantity of at least one ounce or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(4) and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

# COUNT THREE

(Distribution of a Controlled Dangerous Substance--Second Degree)

#### VINCENT A. ESPOSITO

between on or about May 13, 2011 and on or about December 29, 2011, at the Borough of Madison, in the County of Morris, elsewhere, and within the jurisdiction of this Court, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute controlled dangerous substances, Oxycodone, a Schedule II controlled dangerous substance, in a quantity of at least one ounce or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(4) and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

AAG Elie Honio

Deputy Director

Division of Criminal Justice

A TRUE BILL:
Foreperson

Dated: 2.22-13

# FILED

FEB 22 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

	State Grand Jury
	Number <u>SGJ630-13-35</u>
	Superior Court 13-02-00045-S
STATE OF NEW JERSEY	)
v.	ORDER OF VENUE
VINCENT A. ESPOSITO	)
and	)
CDINIUACA DAITI	1

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

IT IS ORDERED on this 22 m day of Falmony, 2013, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Morris 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 Morris for filing.

Mary C. Jacobson, A.J.S.C.