

**FILED**

MAR 03 2016

**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ679-16-11(1)

Superior Court

Docket Number

16-03-00030-S

STATE OF NEW JERSEY )  
 )  
 v. )  
 )  
 CHRISTOPHER CASTELLUZZO, )  
 Also known as "C" )  
 )  
 LUKE ATWELL, )  
 Also known as "L" )  
 )  
 ALDO LAPAIX, )  
 Also known as "DOE" )  
 )  
 ERIC RODRIGUEZ, )  
 Also known as "E" )  
 )  
 HENRY BRACY, )  
 Also known as "BAM" )  
 )  
 SHAZAD KHAN )  
 Also known as "SONNY" )  
 )  
 JOSE RUVALCABA )  
 )  
 MERVIN MENIER )  
 Also known as "MAX" )  
 )  
 JOSE GARCIA-HERNANDEZ )  
 )  
 CHRISTIAN COLLADO )  
 Also known as "YOUNG BOY" )  
 )  
 AN UNIDENTIFIED MALE KNOWN )  
 ONLY AS "DRE" )  
 )  
 JAMAAL JOHNSON )  
 )

INDICTMENT

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

COUNT ONE

(Racketeering - First Degree)

CHRISTOPHER CASTELLUZZO

LUKE ATWELL

ALDO LAPAIX

ERIC RODRIGUEZ

HENRY BRACY

SHAZAD KHAN

JOSE GARCIA-HERNANDEZ

MERVIN MENIER

CHRISTIAN COLLADO

AND

AN UNIDENTIFIED MALE KNOWN ONLY AS "DRE"

and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members of the criminal enterprise, but not defendants herein, at the times and places hereinafter specified, did commit the crime of racketeering, that is, the defendants and other persons employed by or associated with the enterprise engaged in activities which affected trade or commerce in the State of New Jersey, in that they:

1. Purposely or knowingly did conduct or participate directly or indirectly in the conduct of the enterprise's affairs through a pattern of racketeering activity, including the

commission of crimes of the first degree, contrary to the provisions of N.J.S.A. 2C:41-2c; or

2. With the purpose of promoting or facilitating the commission of the crime of racketeering, did conspire or agree together and with persons whose identities are known and unknown to the Grand Jurors, that:

A. One or more of them would engage in conduct which would constitute the crime of racketeering; or

B. One or more of them would aid in the planning, solicitation or commission of the crime of racketeering, that is, to conduct or participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, including the commission of crime of the first degree, in violation of N.J.S.A. 2C:41-2d, all as hereinafter described.

#### THE RELEVANT TIMES AND PLACES

The predicate criminal activity occurred between on or about November 1, 2014, and on or about April 17, 2015, at the City of Absecon, at the Township of Galloway, both in the County of Atlantic, at the Township of Hamilton, in the County of Mercer, at the Borough of Hopatcong, in the County of Sussex, at the City of Passaic, in the County of Passaic, at the Township of North Bergen, at the City of Bayonne, at the City of Jersey City, all in the County of Hudson, at the Borough of Fort Lee, in the

County of Bergen, and elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

CHRISTOPHER CASTELLUZZO, LUKE ATWELL, ALDO LAPAIX, ERIC RODRIGUEZ, HENRY BRACY, SHAZAD KHAN, JOSE GARCIA-HERNANDEZ, MERVIN MENIER, CHRISTIAN COLLADO, AN UNIDENTIFIED MALE KNOWN ONLY AS "DRE," and other persons whose identities are known and unknown to the Grand Jurors, did constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise included collectively generating income on behalf of and for the benefit of the enterprise through the distribution of controlled dangerous substances using a defined structure with roles for each member or associate, dividing and distributing proceeds from enterprise members' and associates' criminal activities in accordance with enterprise protocol, and perpetuating the enterprise through secrecy and the commission or threat of commission of acts of violence.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, consisted of at least two incidents of racketeering conduct by members of the enterprise during the relevant time,

including Murder, Burglary, Money Laundering, Leader of a Narcotics Distribution Network, Distribution of a Controlled Dangerous Substance, and Possession with Intent to Distribute a Controlled Dangerous Substance, or conspiracies to commit these crimes, as described herein and in Counts Two through Eight of this Indictment.

CHRISTOPHER CASTELLUZZO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Leader of a Narcotics Trafficking Network, Murder, Burglary, Distribution of Controlled Dangerous Substances, Possession with Intent to Distribute Controlled Dangerous Substances, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Two through Eight of this Indictment.

LUKE ATWELL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Murder, Burglary, Distribution of Controlled Dangerous Substances, Possession with Intent to Distribute Controlled Dangerous Substances, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Three through Six and Count Eight of this Indictment.

ALDO LAPAIX

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Distribution of Controlled Dangerous Substances, Possession with Intent to Distribute Controlled Dangerous Substances, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Four through Seven of this Indictment.

ERIC RODRIGUEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Murder, Burglary, Distribution of Controlled Dangerous Substances, Possession with Intent to Distribute Controlled Dangerous Substances, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Three, Four, and Eight of this Indictment.

HENRY BRACY

did commit the racketeering conduct by engaging in or conspiring to commit acts of Murder, Burglary, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Three, Four, and Eight of this Indictment.

SHAZAD KHAN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Count Four of this Indictment.

JOSE GARCIA-HERNANDEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances, Possession with Intent to Distribute Controlled Dangerous Substances, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Count Four of this Indictment.

MERVIN MENIER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances, Possession with Intent to Distribute Controlled Dangerous Substances, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Four and Five of this Indictment.

CHRISTIAN COLLADO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances, Possession with Intent to Distribute Controlled Dangerous Substances, which racketeering conduct is the subject of Counts Four through Six of this Indictment.

AN UNIDENTIFIED MALE KNOWN ONLY AS "DRE"

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances and Possession with Intent to Distribute Controlled Dangerous Substances, which racketeering conduct is the subject

of Counts Four through Six of this Indictment.

All in violation of N.J.S.A. 2C:41-2c, N.J.S.A. 2C:41-2d,  
and against the peace of this State, the government, and dignity  
of the same.



COUNT TWO

(Leader of a Narcotics Trafficking Network - First Degree)

CHRISTOPHER CASTELLUZZO

between on or about November 1, 2014, and on or about April 17, 2015, at the City of Absecon, at the Township of Galloway, both in the County of Atlantic, at the Township of Hamilton, in the County of Mercer, at the Borough of Hopatcong, in the County of Sussex, at the City of Passaic, in the County of Passaic, at the Township of North Bergen, at the City of Bayonne, at the City of Jersey City, all in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier, or manager, to engage for profit in a scheme or course of conduct to unlawfully manufacture, distribute, dispense, bring into, or transport in this State cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-3, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Conspiracy to Commit Murder - First Degree)

CHRISTOPHER CASTELLUZZO

LUKE ATWELL

ERIC RODRIGUEZ

AND

HENRY BRACY

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 as defendants herein, between on or about February 20, 2015, and on or about April 17, 2015, at the Township of Hamilton, in the County of Mercer, at the Borough of Hopatcong, in the County of Sussex, at the City of Passaic, in the County of Passaic, at the City of Bayonne, at the City of Jersey City, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of Murder, did agree together 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 the said crimes, that is:

1. Knowingly or purposely to cause the death of N.S. and/or R.S., contrary to the provisions of N.J.S.A.

2C:11-3a(1) or (2) and N.J.S.A. 2C:2-6.

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.

COUNT FOUR

(Conspiracy - Second Degree)

CHRISTOPHER CASTELLUZZO

LUKE ATWELL

ALDO LAPAIX

ERIC RODRIGUEZ

HENRY BRACY

SHAZAD KHAN

JOSE RUVALCABA

JOSE GARCIA-HERNANDEZ

MERVIN MENIER

JAMAAL JOHNSON

CHRISTIAN COLLADO

AND

AN UNIDENTIFIED MALE KNOWN ONLY AS "DRE"

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 as defendants herein, between on or about November 1, 2014, and on or about April 25, 2015, at the City of Absecon, at the Township of Galloway, both in the County of Atlantic, at the Township of Hamilton, in the County of Mercer, at the Borough of Hopatcong, in the County of Sussex, at the City of Passaic, in the County of Passaic, at the

Township of North Bergen, at the City of Bayonne, at the City of Jersey City, all in the County of Hudson, at the Borough of Fort Lee, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Burglary, Distribution of Controlled Dangerous Substances, Possession with Intent to Distribute Controlled Dangerous Substances, and Financial Facilitation of Criminal Activity, did agree together and with persons whose identities are known and unknown to the Grand Jurors, that:

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

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

1. Knowingly or purposely did enter a structure, or a separately secured portion thereof, to commit an offense therein, knowing they were not licensed or privileged to do so, contrary to the provisions of N.J.S.A. 18-2, and N.J.S.A. 2-6.

2. Knowingly or purposely to distribute, and/or 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), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:35-5c, and N.J.S.A. 2C:2-6.

2. Knowingly did transport or possess property known to be, or which a reasonable person would believe to be, derived from criminal activity, with a value of at least \$75,000, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

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.

COUNT FIVE

(Distribution of a Controlled Dangerous Substance / Possession  
with Intent to Distribute of a Controlled Dangerous Substance -  
First Degree)

CHRISTOPHER CASTELLUZZO

LUKE ATWELL

ALDO LAPAIX

MERVIN MENIER

CHRISTIAN COLLADO

AND

AN UNIDENTIFIED MALE KNOWN ONLY AS "DRE"

on or about April 17, 2015, at the City of Absecon, at the  
Township of Galloway, both in the County of Atlantic, at the  
Township of Hamilton, in the County of Mercer, at the Borough of  
Hopatcong, in the County of Sussex, at the City of Passaic, in  
the County of Passaic, elsewhere, and within the jurisdiction of  
this Court, knowingly or purposely did distribute and/or did  
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), N.J.S.A. 2C:35-5b(1),  
N.J.S.A. 2C:35-5c, and N.J.S.A. 2C:2-6, and against the peace of  
this State, the government and dignity of the same.

COUNT SIX

(Possession with Intent to Distribute a Controlled Dangerous Substance - Second Degree)

CHRISTOPHER CASTELLUZZO

LUKE ATWELL

ALDO LAPAIX

CHRISTIAN COLLADO

AND

AN UNIDENTIFIED MALE KNOWN ONLY AS "DRE"

on or about April 17, 2015, at the City of Absecon, at the Township of Galloway, both in the County of Atlantic, at the Township of Hamilton, in the County of Mercer, at the Borough of Hopatcong, in the County of Sussex, at the City of Passaic, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, Ethylone, a Schedule I controlled dangerous substance, in a quantity of 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), N.J.S.A. 2C:35-5c, and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.



COUNT SEVEN

(Financial Facilitation of  
Criminal Activity (Money Laundering) - Second Degree)

CHRISTOPHER CASTELLUZZO

and

ALDO LAPAIX

on or about April 17, 2015, at the City of Passaic, in the County of Passaic, at the Borough of Hopatcong, in the County of Sussex, at the Township of Galloway, at the City of Absecon, both in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known to be, or which a reasonable person would believe to be, derived from criminal activity with a value of more than \$75,000, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Burglary - Third Degree)

CHRISTOPHER CASTELLUZZO

LUKE ATWELL

ERIC RODRIGUEZ

AND

HENRY BRACY

on or about February 25, 2015, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court did, with purpose to commit an offense therein, enter a structure, or a separately secured portion thereof, knowing that they were not licensed or privileged to do so, contrary to the provisions of N.J.S.A. 2C:18-2 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Distribution of a Controlled Dangerous Substance  
- First Degree)

ALDO LAPAIX

between on or about September 1, 2014 and on or about December 1, 2014, at the City of Absecon, at the City of Pleasantville, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did 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), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:35-5c, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Distribution of a Controlled Dangerous Substance  
- Second Degree)

CHRISTIAN COLLADO

on or about November 2, 2014, at the City of Pleasantville, in the county of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute cocaine in a quantity of one-half 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(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Manufacture, Transport, Disposition and Defacement of Weapons  
and Danger Instruments and Appliances (Firearm Silencer) -  
Fourth Degree)

CHRISTOPHER CASTELLUZZO

between on or about February 20, 2015 and April 17, 2015, at the  
City of Absecon, at the Township of Galloway, both in the County  
of Atlantic, at the Borough of Hopatcong, in the County of  
Sussex, at the City of Passaic, in the County of Passaic,  
elsewhere, and within the jurisdiction of this Court, did  
manufacture, cause to be manufactured, transport, ship, sell or  
dispose of a firearm silencer, contrary to the provisions of  
N.J.S.A. 2C:39-9c, and against the peace of this State, the  
government and dignity of the same.

COUNT TWELVE

(Possession of Prohibited Devices (Firearm Silencer)-  
Fourth Degree)

ALDO LAPAIX

on or about April 17, 2015, at the City of Absecon, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a prohibited device, that is, a firearm silencer, contrary to the provisions of N.J.S.A. 2C:39-3c, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Resisting Arrest (Eluding) - Second Degree)

JAAMAL JOHNSON

on or about April 17, 2015, at the City of Passaic, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, while operating a motor vehicle on the streets and highways of this State, did knowingly flee or attempt to elude Detectives Travis Johnson and Mario Estrada of the New Jersey Division of Criminal Justice, after having received any signal from such officers to bring the vehicle to a full stop, and in so doing created a risk of death or injury to any person, contrary to the provisions of N.J.S.A. 2C:29-2b, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Conspiracy to Commit Financial Facilitation of  
Criminal Activity (Money Laundering) - First Degree)

SHAZAD KHAN

and

JOSE RUVALCABA

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 as defendants herein, on or about April 25, 2015, at the Township of North Bergen, in the County of Hudson, at the Borough of Fort Lee, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of Financial Facilitation of Criminal Activity, did agree together 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 the said crimes, that is:

1. To knowingly or purposely transport or possess property known to be, or which a reasonable person would believe to be, derived from criminal activity, that is, more than \$500,000 in United States currency, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6.

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.

COUNT FIFTEEN

(Financial Facilitation of  
Criminal Activity (Money Laundering)- First Degree)

SHAZAD KHAN

and

JOSE RUVALCABA

on or about April 25, 2015, at the Township of North Bergen, in the County of Hudson, at the Borough of Fort Lee, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known to be, or which a reasonable person would believe to be, derived from criminal activity, that is, more than \$500,000 in United States currency, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Possession of a Controlled Dangerous Substance  
- Third Degree)

LUKE ATWELL

on or about April 17, 2015, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess Nandrolone, a Schedule III controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10, and against the peace of this State, the government and dignity of the same.



Elie Honig  
Director  
Division of Criminal Justice

A TRUE BILL:

  
Foreperson

DATE:

33 2016

**FILED**

**MAR 03 2016**

**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ679-16-11(1)

Superior Court

16 - 03 - 00030 - S

Docket Number

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

CHRISTOPHER CASTELLUZZO )  
also known as )  
"C" )

LUKE ATWELL )  
also known as )  
"L" )

ALDO LAPAIX )  
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also known as )  
"YOUNG BOY" )

AN UNIDENTIFIED MALE KNOWN )  
ONLY AS "DRE" )

JAMAAL JOHNSON

)

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

IT IS ORDERED on this 3 day of *MAR* 2016, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Atlantic 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 Atlantic filing.

Robert C. Billmeier, J.S.C.