

AUGUST 17, 2021

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ759-21-6
Superior Court
Docket Number 21-8-116-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

LAMAR SOTO)

JIRMAN SOTO)

SELENA SOTO)

RUBEN ZAYAS)

JULIO ARROYO)

GENARO MOLINA)

ASHLEY PETRUCHELLI)

LUIS RIVERA)

PEDRO LUCIANO)

WENDELL BETHEA)

and)

ALBERTO LOPEZ)

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

COUNT ONE

(Racketeering - First Degree)

LAMAR SOTO

JIRMAN SOTO

SELENA SOTO

RUBEN ZAYAS

JULIO ARROYO

GENARO MOLINA

ASHLEY PETRUCHELLI

LUIS RIVERA

PEDRO LUCIANO

and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members of the enterprise, but not as defendants herein, at the times and places herein specified, did commit the crime of Racketeering, that is, the defendants and other persons employed by or associated with the enterprise engaged in the activities which affected trade or commerce, 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, in violation 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 agree 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 crimes 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 12, 2020, and on or about May 26, 2021, at the City of Camden, in the County of Camden, in the State of New Jersey, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

LAMAR SOTO, JIRMAN SOTO, SELENA SOTO, RUBEN ZAYAS, JULIO ARROYO, GENARO MOLINA, ASHLEY PETRUCHELLI, LUIS RIVERA, PEDRO LUCIANO, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members or associates of the enterprise, but not as defendants herein, did constitute an "enterprise" within the meaning of N.J.S.A. 2C:41-1c, that is, a

group of individuals associated in fact, or associates thereof, which engaged in activities which affected trade or commerce.

THE PURPOSES OF THE ENTERPRISE

At all times relevant to this Indictment, the named individuals operated as a criminal enterprise operating throughout the city of Camden, New Jersey. The individuals included in this charge constitute an ongoing criminal enterprise whose members and associates function as a continuing unit for the common purpose of achieving the objectives of the enterprise. It was part of the conspiracy that the purposes of the enterprise would include the following:

A. Collectively generating income on behalf of and for the benefit of the enterprise members and associates through violations of the laws of the State of New Jersey, including the commission of the crimes of leader of a firearms trafficking network; distribution of firearms; distribution of controlled dangerous substances; and theft, receiving stolen property, and fencing; and

B. Accomplishing the goals of the enterprise through the collection of proceeds generated through the commission of various crimes from members of the enterprise, said proceeds to be utilized for the advancement and benefit of the enterprise and/or its

leaders; and

C. Protecting the perpetuation of the enterprise by shielding its operation from detection by law enforcement authorities by, among other things, concealing the means and locations from which it conducts its affairs, using wireless telephones, using a variety of locations, residences, or motor vehicles for storage or delivery of stolen motorcycles, weapons, and controlled dangerous substances;

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 the enterprise during the relevant time, including Leader of a Firearms Trafficking Network (N.J.S.A. 2C:39-16); Manufacture, Transport, Disposition and Defacement of Weapons and Dangerous Instruments (N.J.S.A. 2C:39-9(d)(f)(n)); Distribution of Controlled Dangerous Substances (N.J.S.A. 2C:35-5b(2), N.J.S.A. 2C:35-5b(8)); Receiving Stolen Property (N.J.S.A. 2C:20-7); Fencing (N.J.S.A. 2C:20-7.1); and Conspiracy to commit these crimes (N.J.S.A. 2C:5-2), as described herein and in Counts Three, Five, Seven, Nine, Twelve, Fifteen, Seventeen, Nineteen, Twenty-One, Twenty-Three, Twenty-Six, Twenty-Nine, Thirty-Two, Thirty-Five, Thirty-Seven, Thirty-Nine, Forty-Two, Forty-Five, Forty-Eight,

Fifty, Fifty-Two, Fifty-Four, Fifty-Five, Fifty-Seven, Fifty-Eight, Fifty-Nine, Sixty, and Sixty-One.

LAMAR SOTO

did commit the racketeering conduct by engaging in and/or conspiring to commit repeated acts of Leader of a Firearms Trafficking Network; Manufacture, Transport, Disposition and Defacement of Weapons and Dangerous Instruments; Distribution of Controlled Dangerous Substances; Conspiracy to Distribute CDS; Conspiracy to Commit Receiving Stolen Property, Fencing, and Theft; Receiving Stolen Property; and Fencing, which racketeering conduct is the subject of Counts Three, Five, Seven, Nine, Twelve, Fifteen, Seventeen, Nineteen, Twenty-One, Twenty-Three, Twenty-Six, Twenty-Nine, Thirty-Two, Thirty-Five, Thirty-Seven, Thirty-Nine, Forty-Two, Forty-Five, Forty-Eight, Fifty, Fifty-Two, Fifty-Four, Fifty-Five, Fifty-Seven, Fifty-Eight, Fifty-Nine, Sixty, and Sixty-One of this Indictment.

JIRMAN SOTO

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Manufacture, Transport, Disposition and Defacement of Weapons and Dangerous Instruments; Distribution of Controlled Dangerous Substances; Conspiracy to Distribute CDS; Conspiracy to Commit Receiving Stolen Property,

Fencing, and Theft; Receiving Stolen Property; and Fencing, which racketeering conduct is the subject of Counts Five, Seven, Nine, Twelve, Fifteen, Twenty-One, Twenty-Three, Fifty-Five, Fifty-Seven, Fifty-Eight, Fifty-Nine, Sixty, and Sixty-One of this Indictment.

RUBEN ZAYAS

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Manufacture, Transport, Disposition and Defacement of Weapons and Dangerous Instruments; Conspiracy to Distribute CDS; Conspiracy to Commit Receiving Stolen Property, Fencing, and Theft; Receiving Stolen Property; and Fencing, which racketeering conduct is the subject of Counts Fifteen, Twenty-One, Twenty-Three, Twenty-Six, Twenty-Nine, Thirty-Two, Fifty-Eight, Fifty-Nine, Sixty, and Sixty-One of this Indictment.

SELENA SOTO

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Conspiracy to Commit Receiving Stolen Property, Fencing, and Theft; Receiving Stolen Property; and Fencing, Manufacture, Transport, Disposition and Defacement of Weapons and Dangerous Instruments which racketeering conduct is the subject of Counts Twenty-One, Twenty-Three, Fifty-

Nine, Sixty, and Sixty-One of this Indictment.

JULIO ARROYO

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Conspiracy to Commit Receiving Stolen Property, Fencing, and Theft; Receiving Stolen Property; and Fencing, which racketeering conduct is the subject of Counts Fifty-Nine, Sixty, and Sixty-One of this Indictment.

GENARO MOLINA

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Conspiracy to Commit Receiving Stolen Property, Fencing, and Theft; Receiving Stolen Property; and Fencing, which racketeering conduct is the subject of Counts Fifty-Nine, Sixty, and Sixty-One of this Indictment.

ASHLEY PETRUCHELLI

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Conspiracy to Commit Receiving Stolen Property, Fencing, and Theft; Receiving Stolen Property; and Fencing, which racketeering conduct is the subject of Counts Fifty-Nine, Sixty, and Sixty-One of this Indictment.

LUIS RIVERA

did commit the racketeering conduct by engaging in and or

conspiring to commit repeated acts of Conspiracy to Commit Receiving Stolen Property, Fencing, and Theft; Receiving Stolen Property; and Fencing, which racketeering conduct is the subject of Counts Fifty-Nine, Sixty, and Sixty-One of this Indictment.

PEDRO LUCIANO

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of Conspiracy to Commit Receiving Stolen Property, Fencing, and Theft; Receiving Stolen Property; and Fencing, which racketeering conduct is the subject of Counts Fifty-Nine, Sixty, and Sixty-One of this Indictment.

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

COUNT TWO

(Promoting Organized Street Crime - First Degree)

LAMAR SOTO

between on or about November 13, 2020, and May 26, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, conspired with others as an organizer, supervisor, financier, or manager to commit one or more of the crimes enumerated in N.J.S.A. 2C:33-30, specifically, Theft, in violation of N.J.S.A. 2C:20-2; Receiving Stolen Property, in violation of N.J.S.A. 2C:20-7; Fencing, in violation of N.J.S.A. 2C:20-7.1; Leader of a Firearms Trafficking Network, in violation of N.J.S.A. 2C:39-16; Unlawful Possession of a Weapon, in violation of N.J.S.A. 2C:39-5; Manufacture, Transport, Disposition, and Defacement of Weapons, in violation of N.J.S.A. 2C:39-9; and Distribution of a Controlled Dangerous Substance, in violation of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:35-5b(8); contrary to the provisions of N.J.S.A. 2C:33-30, and against the peace of this State, the government, and dignity of the same.

COUNT THREE

(Leader of a Firearms Trafficking Network - First Degree)

LAMAR SOTO

between on or about March 9, 2021, and May 26, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others as an organizer, supervisor, financier, or manager to unlawfully transport or sell firearms, contrary to the provisions of N.J.S.A. 2C:39-16, and against the peace of this State, the government, and dignity of the same.

COUNT FOUR

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 9, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Taurus 9mm handgun, serial number ACA392790, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 9, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a Taurus 9mm handgun, serial number ACA392790, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT SIX

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 15, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Smith & Wesson 9mm handgun, serial number HKW7717, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 15, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a Smith & Wesson 9mm handgun, serial number HKW7717, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT EIGHT

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 18, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Smith & Wesson 9mm handgun, serial number FCA0692, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 18, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a Smith & Wesson 9mm handgun, serial number FCA0692, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 18, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, an unbranded 9mm P80 handgun with no serial number, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Unlawful Possession of a Firearm
without a Serial Number – Third Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 18, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did possess a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver, as defined in N.J.S.A. 2C:39-9k, which was not imprinted with a serial number registered with a federally licensed manufacturer, that is, a 9mm semi-automatic Polymer 80 handgun, contrary to the provisions of N.J.S.A. 2C:39-3n, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Unlawful Disposition of a Handgun - Third Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 18, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in N.J.S.A. 2C:39-9k which is not imprinted with a serial number registered with a federally licensed manufacturer, that is, an unbranded 9mm semi-automatic Polymer 80 handgun with no serial number, contrary to the provisions of N.J.S.A. 2C:39-9n, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Prohibited Weapons and Devices - Fourth Degree)

LAMAR SOTO

and

JIRMAN SOTO

on or about March 18, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3j, and against the peace of this State, the government, and dignity of the same.

COUNT FOURTEEN

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

JIRMAN SOTO

and

RUBEN ZAYAS

on or about March 23, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Jimenez Arms 9mm handgun, serial number 117628, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

JIRMAN SOTO

and

RUBEN ZAYAS

on or about March 23, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a Jimenez Arms 9mm handgun, serial number 117628, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

on or about April 14, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .45 Haskell Hi Point handgun, serial number X4323576, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

on or about April 14, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a .45 Haskell Hi Point handgun, serial number X4323576, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

on or about April 14, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .357 Smith & Wesson Revolver, serial number ADD0309, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

on or about April 14, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a .357 Smith & Wesson Revolver, serial number ADD0309, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

JIRMAN SOTO

RUBEN ZAYAS

and

SELENA SOTO

on or about April 29, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Jennings 9mm handgun, serial number 1518730, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

JIRMAN SOTO

RUBEN ZAYAS

and

SELENA SOTO

on or about April 29, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a Jennings 9mm handgun, serial number 1518730, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

JIRMAN SOTO

RUBEN ZAYAS

and

SELENA SOTO

on or about April 29, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Smith and Wesson .40 handgun, serial number FZP6966, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

JIRMAN SOTO

RUBEN ZAYAS

and

SELENA SOTO

on or about April 29, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a Smith and Wesson .40 handgun, serial number FZP6966, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 3, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, an unbranded 9mm Polymer 80 handgun with no serial number, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Unlawful Possession of a Firearm
without a Serial Number – Third Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 3, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did possess a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver, as defined in N.J.S.A. 2C:39-9k, which was not imprinted with a serial number registered with a federally licensed manufacturer, that is, a 9mm semi-automatic Polymer 80 handgun, contrary to the provisions of N.J.S.A. 2C:39-3n, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Unlawful Disposition of a Handgun - Third Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 3, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in N.J.S.A. 2C:39-9k which is not imprinted with a serial number registered with a federally licensed manufacturer, that is, an unbranded 9mm semi-automatic Polymer 80 handgun with no serial number, contrary to the provisions of N.J.S.A. 2C:39-9n, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 3, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, an unbranded 9mm P80 handgun with no serial number, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Unlawful Possession of a Firearm
without a Serial Number – Third Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 3, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did possess a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver, as defined in N.J.S.A. 2C:39-9k, which was not imprinted with a serial number registered with a federally licensed manufacturer, that is, a 9mm semi-automatic Polymer 80 handgun, contrary to the provisions of N.J.S.A. 2C:39-3n, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Unlawful Disposition of a Handgun - Third Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 3, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in N.J.S.A. 2C:39-9k which is not imprinted with a serial number registered with a federally licensed manufacturer, that is, an unbranded 9mm semi-automatic Polymer 80 handgun with no serial number, contrary to the provisions of N.J.S.A. 2C:39-9n, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 7, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, an unbranded 9mm P80 handgun with no serial number, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Unlawful Possession of a Firearm
without a Serial Number – Third Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 7, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did possess a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver, as defined in N.J.S.A. 2C:39-9k, which was not imprinted with a serial number registered with a federally licensed manufacturer, that is, a 9mm semi-automatic Polymer 80 handgun, contrary to the provisions of N.J.S.A. 2C:39-3n, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Unlawful Disposition of a Handgun - Third Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 7, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in N.J.S.A. 2C:39-9k which is not imprinted with a serial number registered with a federally licensed manufacturer, that is, an unbranded 9mm semi-automatic Polymer 80 handgun with no serial number, contrary to the provisions of N.J.S.A. 2C:39-9n, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Prohibited Weapons and Devices - Fourth Degree)

LAMAR SOTO

and

RUBEN ZAYAS

on or about May 7, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3j, and against the peace of this State, the government, and dignity of the same.

COUNT THIRTY-FOUR

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

on or about May 12, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Haskell Manufacturing .45 handgun, serial number X4267936, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

on or about May 12, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a Haskell Manufacturing .45 handgun, serial number X4267936, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Unlawful Possession of an Assault Firearm - Second Degree)

LAMAR SOTO

on or about May 12, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, an Izhmash semi-automatic rifle, serial number H04106433, contrary to the provisions of N.J.S.A. 2C:39-5f, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SEVEN

(Unlawful Disposition of an Assault Firearm - Third Degree)

LAMAR SOTO

on or about May 12, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of an assault firearm, that is, an Izhmash semi-automatic rifle, serial number H04106433, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-EIGHT

(Unlawful Possession of an Assault Firearm - Second Degree)

LAMAR SOTO

on or about May 17, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, a 300 AAC Blackout semiautomatic rifle with no serial number, contrary to the provisions of N.J.S.A. 2C:39-5f, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Unlawful Disposition of an Assault Firearm - Third Degree)

LAMAR SOTO

on or about May 17, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of an assault firearm, that is, a 300 AAC Blackout semiautomatic rifle with no serial number, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9g, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

on or about May 17, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, an unbranded 9mm semi-automatic Polymer 80 handgun with no serial number, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-ONE

(Unlawful Possession of a Firearm
without a Serial Number – Third Degree)

LAMAR SOTO

on or about May 17, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did possess a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver, as defined in N.J.S.A. 2C:39-9k, which was not imprinted with a serial number registered with a federally licensed manufacturer, that is, a 9mm semi-automatic Polymer 80 handgun, contrary to the provisions of N.J.S.A. 2C:39-3n, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

(Unlawful Disposition of a Handgun - Third Degree)

LAMAR SOTO

on or about May 17, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in N.J.S.A. 2C:39-9k which is not imprinted with a serial number registered with a federally licensed manufacturer, that is, an unbranded 9mm semi-automatic Polymer 80 handgun with no serial number, contrary to the provisions of N.J.S.A. 2C:39-9n, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-THREE

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

on or about May 19, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, an unbranded 9mm Luger handgun with no serial number, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FOUR

(Unlawful Possession of a Firearm
without a Serial Number – Third Degree)

LAMAR SOTO

on or about May 19, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did possess a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver, as defined in N.J.S.A. 2C:39-9k, which was not imprinted with a serial number registered with a federally licensed manufacturer, that is, an unbranded 9mm Luger handgun with no serial number, contrary to the provisions of N.J.S.A. 2C:39-3n, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FIVE

(Unlawful Disposition of a Handgun - Third Degree)

LAMAR SOTO

on or about May 19, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in N.J.S.A. 2C:39-9k which is not imprinted with a serial number registered with a federally licensed manufacturer, that is, an unbranded 9mm Luger handgun with no serial number, contrary to the provisions of N.J.S.A. 2C:39-9n, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SIX

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

on or about May 19, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, an unbranded 9mm Luger handgun with no serial number, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SEVEN

(Unlawful Possession of a Firearm
without a Serial Number – Third Degree)

LAMAR SOTO

on or about May 19, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did possess a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver, as defined in N.J.S.A. 2C:39-9k, which was not imprinted with a serial number registered with a federally licensed manufacturer, that is, an unbranded 9mm Luger handgun with no serial number, contrary to the provisions of N.J.S.A. 2C:39-3n, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-EIGHT

(Unlawful Disposition of a Handgun - Third Degree)

LAMAR SOTO

on or about May 19, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver as defined in N.J.S.A. 2C:39-9k which is not imprinted with a serial number registered with a federally licensed manufacturer, that is, an unbranded 9mm Luger handgun with no serial number, contrary to the provisions of N.J.S.A. 2C:39-9n, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-NINE

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

on or about May 26, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Springfield 9mm Xd9 handgun, serial number AT215968, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

on or about May 26, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a Springfield 9mm Xd9 handgun, serial number AT215968, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-ONE

(Unlawful Possession of a Weapon - Second Degree)

LAMAR SOTO

on or about May 26, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Taurus G2x 9mm handgun, serial number TLY05090, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-TWO

(Unlawful Disposition of a Handgun - Fourth Degree)

LAMAR SOTO

on or about May 26, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport, ship, sell or dispose of a firearm, that is, a Taurus G2x 9mm handgun, serial number TLY05090, without being licensed or registered to do so as provided in Chapter 58, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

LAMAR SOTO

JIRMAN SOTO

and

WENDELL BETHEA

between on or about April 14, 2021, and on or about May 7, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, methamphetamine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government, and dignity of the same.

COUNT FIFTY-FOUR

(Distribution of a Controlled Dangerous
Substance - First Degree)

LAMAR SOTO

between on or about April 14, 2021, and on or about May 7, 2021,
at the City of Camden, in the County of Camden, elsewhere, and
within the jurisdiction of this Court, knowingly did distribute a
controlled dangerous substance, that is, methamphetamine, 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(8), N.J.S.A. 2C:35-5c and against the peace of
this State, the government, and dignity of the same.

COUNT FIFTY-FIVE

(Distribution of a Controlled Dangerous
Substance - Second Degree)

JIRMAN SOTO

and

WENDELL BETHEA

on or about April 29, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did distribute a controlled dangerous substance, that is, methamphetamine, 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(9) (a), N.J.S.A. 2C:35-5c, N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT FIFTY-SIX

(Possession of a Controlled Dangerous Substance - Third Degree)

LAMAR SOTO

and

JIRMAN SOTO

between on or about February 5, 2021, and on or about March 15, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government, and dignity of the same.

COUNT FIFTY-SEVEN

(Distribution of a Controlled Dangerous
Substance - Second Degree)

LAMAR SOTO

and

JIRMAN SOTO

between on or about February 5, 2021, and on or about March 15, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did distribute a controlled dangerous substance, that is, 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), N.J.S.A. 2C:35-5c, N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT FIFTY-EIGHT

(Conspiracy - Second Degree)

LAMAR SOTO

JIRMAN SOTO

RUBEN ZAYAS

and

WENDELL BETHEA

who are named as a defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about February 5, 2021, and on or about May 7, 2021, at the City of Camden, in the County of Camden, 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 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 did distribute a controlled dangerous substance, that is, methamphetamine, 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(9) (a),
N.J.S.A. 2C:35-5c,; and

2. Knowingly did distribute a controlled dangerous substance, that is, 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), N.J.S.A. 2C:35-5c.

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 FIFTY-NINE

(Conspiracy - Second Degree)

LAMAR SOTO

JIRMAN SOTO

SELENA SOTO

RUBEN ZAYAS

JULIO ARROYO

GENARO MOLINA

ASHLEY PETRUCHELLI

LUIS RIVERA

PEDRO LUCIANO

WENDELL BETHEA

and

ALBERTO LOPEZ

who are named as a defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about November 13, 2020, and on or about May 26, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Theft, Receiving Stolen Property, and Fencing, 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 said crimes, that is:

1. Knowingly did unlawfully take or exercise control over the moveable property of another, that is, motorcycles and ATVs having a value of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:20-2; and

2. Knowingly did receive or bring into this State movable property of others, that is, motorcycles and ATVs having a value of \$75,000 or more, knowing that they were stolen or believing that they had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7b; and

2. Knowingly did traffic in, initiate, organize, plan, finance, direct, manage or supervise trafficking in stolen property, that is, motorcycles and ATVs having a value of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:20-7.1a.

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 SIXTY

(Receiving Stolen Property - Second Degree)

LAMAR SOTO

JIRMAN SOTO

SELENA SOTO

JULIO ARROYO

ASHLEY PETRUCELLI

PEDRO LUCIANO

GENARO MOLINA

LUIS RIVERA

and

RUBEN ZAYAS

between on or about November 13, 2020, and on or about April 14, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did receive or bring into this State movable property of others, that is, motorcycles and ATVs having a value of \$75,000 or more, knowing that they were stolen or believing that they had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7b, N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT SIXTY-ONE

(Fencing - Second Degree)

LAMAR SOTO

JIRMAN SOTO

SELENA SOTO

JULIO ARROYO

ASHLEY PETRUCELLI

PEDRO LUCIANO

GENARO MOLINA

LUIS RIVERA

and

RUBEN ZAYAS

between on or about November 13, 2020, and on or about April 14, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did traffic in, initiate, organize, plan, finance, direct, manage or supervise trafficking in stolen property, that is, motorcycles and ATVs having a value of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:20-7.1a, N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT SIXTY-TWO

(Certain Persons Not to Have Weapons - Second Degree)

LAMAR SOTO

between on or about March 9, 2021, and on or about May 26, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Third Degree Possession of CDS on School Property with Intent to Distribute in Camden County, on Indictment number 14-04-01141-I, did purchase, own, possess, or control the following firearm(s): a Springfield 9mm Xd9 Handgun, serial number AT215968; a Taurus 9mm handgun, serial number ACA392790; a Smith & Wesson 9mm handgun, serial number HKW7717; a Smith & Wesson 9mm handgun, serial number FCA0692; a 9mm P80 handgun with no serial number; a Jimenez Arms 9mm handgun, serial number 117628; a .357 Smith & Wesson Revolver, serial number FZP6966; a Jennings 9mm handgun, serial number 1518730; a Smith and Wesson .40 handgun, serial number ADD0309; an unbranded 9mm P80 handgun with no serial number; an unbranded 9mm P80 handgun with no serial number; a Haskell Manufacturing .45 handgun, serial number X4267936; an Izhmash semi-automatic rifle, serial number H04106433; a 300 AAC Blackout semiautomatic rifle with no serial number; an unbranded P80 handgun with no serial number; an unbranded 9mm Luger handgun with no serial number; an unbranded 9mm Luger handgun with no

serial number; a Springfield 9mm Xd9 handgun, serial number AT215968; a Taurus G2x 9mm handgun, serial number TLY05090, contrary to the provisions of N.J.S.A. 2C:39-7, and against the peace of this State, the government, and dignity of the same.

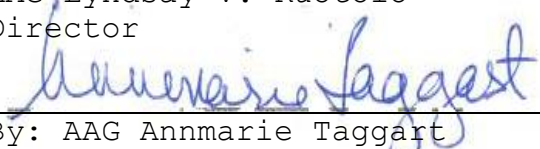
COUNT SIXTY-THREE

(Certain Persons Not to Have Weapons - Second Degree)

JIRMAN SOTO

between on or about March 9, 2021, and May 26, 2021, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Third Degree Possession of Prohibited Weapons in Camden County, on Indictment number 13-04-01347-I, did purchase, own, possess, or control the following firearm(s): a Taurus 9mm handgun with a defaced serial number ACA392790; a Smith & Wesson 9mm handgun, serial number HKW7717; a Smith & Wesson 9mm handgun, serial number FCA0692; a 9mm P80 handgun with no serial number; a Jimenez Arms 9mm handgun, serial number 117628; a Jennings 9mm handgun, serial number 1518730; a Smith and Wesson .40 handgun, serial number ADD0309, contrary to the provisions of N.J.S.A. 2C:39-7, and against the peace of this State, the government, and dignity of the same.

AAG Lyndsay V. Ruotolo
Director


By: AAG Annmarie Taggart
Deputy Director
Division of Criminal Justice

A True Bill:

_____, Foreperson
Dated: 8/17/2021

