

**SUPERIOR COURT OF N.J.  
FILED**

**JUL 05 2007**

*Handwritten signature: Andrew J. ...  
Clerk*

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL  
State Grand Jury  
Number SGJ 539-07-8

Superior Court  
Docket Number 07-07-00084-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

CARLOS DELEON )

and )

GUSTAVO J. CANTU-FLORES )

also known as )  
"CHINO" )

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

COUNT ONE

(Conspiracy - Second Degree)

CARLOS DELEON

and

GUSTAVO J. CANTU-FLORES

who are defendants herein, and other persons whose  
identities are both known and unknown to the Grand Jurors,  
who are co-conspirators, but not named as defendants herein,  
between on or about April 12, 2007, and on or about April  
13, 2007, at the City of New Brunswick, and at the Townships  
of Edison and North Brunswick, all in the County of

Middlesex, elsewhere, and within the jurisdiction of the Court, with the purpose of promoting or facilitating the commission of the crimes of distribution of a controlled dangerous substance, possession with intent to distribute a controlled dangerous substance and money laundering, did agree together that:

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

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

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

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

3. Knowingly to transport or possess property known to be derived from criminal activity or to engage in a transaction involving property known to be derived from

criminal activity with the intent to facilitate or promote  
the criminal activity, contrary to the provisions of  
N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b.

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 TWO

(Distribution of a Controlled Dangerous  
Substance - First Degree)

CARLOS DELEON

and

GUSTAVO J. CANTU-FLORES

between on or about April 12, 2007, and on or about April 13, 2007, at the City of New Brunswick, and at the Township of Edison, both in the County of Middlesex, elsewhere, and within the jurisdiction of the Court, knowingly or purposely did distribute cocaine, in a quantity of five ounces or more including any adulterants or dilutants, that being approximately twenty-three kilograms of cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

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

CARLOS DELEON

and

GUSTAVO J. CANTU-FLORES

between on or about April 12, 2007, and on or about April 13, 2007, at the City of New Brunswick, and at the Township of Edison, both in the County of Middlesex, elsewhere, and within the jurisdiction of the Court, knowingly or purposely 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, that being approximately twenty-three kilograms of cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Attempted Money Laundering - Second Degree)

CARLOS DELEON

and

GUSTAVO J. CANTU-FLORES

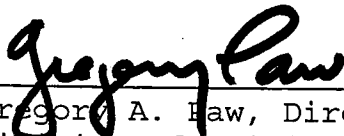
between on or about April 12 ,2007, and on or about April 13, 2007, at the City of New Brunswick, and at the Townships of Edison and North Brunswick, all in the County of Middlesex, elsewhere, and within the jurisdiction of the Court, did knowingly attempt to transport or possess property known to be derived from criminal activity or to engage in a transaction involving property known to be derived from criminal activity with the intent to facilitate or promote the criminal activity, that is, United States currency in an amount of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b, N.J.S.A. 2C:5-1, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

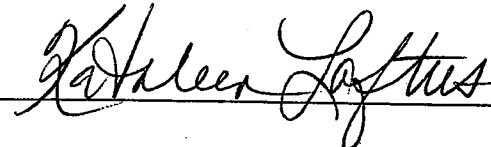
(Money Laundering - Third Degree)

GUSTAVO J. CANTU-FLORES

on or about April 13, 2007, at the Township of North Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of the Court, did knowingly transport or possess property known to be derived from criminal activity or did engage in a transaction involving property known to be derived from criminal activity with the intent to facilitate or promote the criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

  
\_\_\_\_\_  
Gregory A. Law, Director  
Division of Criminal  
Justice

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

Dated: 7/5/07

CLERK OF SUPERIOR COURT  
SUPERIOR COURT OF N.J.  
MERCER COUNTY  
RECEIVED AND FILED

SUPERIOR COURT OF N.J.  
FILED

JUL - 5 2007

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

*Dee Regan*  
*Dee J. Regan*  
SUE REGAN  
DEPUTY CLERK OF SUPERIOR COURT

State Grand Jury  
Number SGJ539-07-8  
Superior Court  
Docket Number 07-07-00084-S

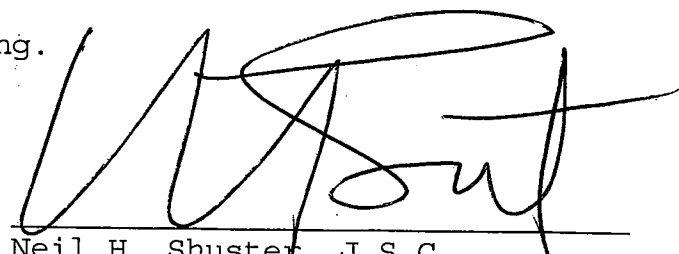
STATE OF NEW JERSEY )  
  
v. )  
  
CARLOS DELEON )  
  
and )  
  
GUSTAVO J. CANTU-FLORES )  
also known as )  
"CHINO" )

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 \_\_\_\_\_ day of \_\_\_\_\_, 2007, pursuant to paragraph 8 of the State Grand Jury Act, that the County of <sup>Middlesex</sup> Middlesex 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 Middlesex for filing.

  
Neil H. Shuster, J.S.C.