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BUPERIOR COURT

CLERK'S OFFICE SUPERIOR COLLEGE

STATE OF NEW JERSEY v. LUIS ROMAN, AKA "KING KONG," AKA "PIPI," AKA "RO," AKA "PIG," AKA "PP" JUSTINIANO VAZQUEZ, AKA "JUSTO VASQUEZ," AKA "JUSTLIANO VASQUEZ," AKA "JUSINIANO VASQUEZ" ANGEL VASQUEZ, AKA "A" WILLIE WADE, AKA "NORMAN," AKA "NORM," AKA "WILL" ALVIN BLANKSON, AKA "NATTY DAVIS," AKA "P.U." DWAYNE MANN, AKA "NEW YORK" JOHNNY JONES, AKA "Z," AKA "ZAR," AKA "CZAR" LEANDER WILLIAMS, AKA "SHA,"

AKA "SHALEIK"

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury Number SGJ593-10-5 Superior Court Docket Number 10-09-00116-8

INDICTMENT

MALIK TEEL, AKA "REDS," AKA "TEEL" QUADIR BARNES, AKA "Q" STACEY MOORE, AKA "PIKE" TRACY MAINOR, AKA "MISSY" ROZZION FOXX YAKYRA HICKSON NYANTEE DAVIS CHEZ HODGES TYNISHA MOORE ALICIA HOLLOWAY and SHANTA BARNES

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

COUNT ONE

(Racketeering - Second Degree)

LUIS ROMAN

JUSTINIANO VAZQUEZ

ANGEL VASQUEZ

WILLIE WADE

ALVIN BLANKSON

DWAYNE MANN

JOHNNY JONES

LEANDER WILLIAMS

MALIK TEEL

QUADIR BARNES

STACEY MOORE

TRACY MAINOR

ROZZION FOXX

YAKYRA HICKSON

NYANTEE DAVIS

CHEZ HODGES

TYNISHA MOORE

ALICIA HOLLOWAY

and

SHANTA BARNES

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, all being members or associates of a criminal enterprise involved in bribery and the smuggling of wireless telephones, narcotics and other contraband into the New Jersey State Prison system, 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 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 or collection of unlawful debt, 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 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, contrary to the provisions of N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES AND PLACES

The predicate criminal activity and conspiracy occurred between on or about August 27, 2007, and on or about November 14, 2009, at the Township of Woodbridge, at the City of Perth Amboy, and at the Township of North Brunswick, all in the County of Middlesex, at the City of Bridgeton, in the County of Cumberland, at the Township of Middle Township, in the County of Cape May, at

the City of Newark, at the Township of Bloomfield, at the Township of Montclair, and at the Township of Nutley, all in the County of Essex, at the Borough of Fair Lawn, in the County of Bergen, at the City of Paterson, in the County of Passaic, at the City of Millville, in the County of Cumberland, at the Township of Ewing, in the County of Mercer, at the City of Elizabeth, and at the City of Linden, both in the County of Union, at the Town of West New York, and at the City of Jersey City, both in the County of Hudson, at the City of Beverly, in the County of Burlington, at the City of Somers Point, in the County of Atlantic, in the State of New York, in the State of Florida, in the Commonwealth of Pennsylvania, in the State of Connecticut, in the State of Wisconsin, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

1. At all times relevant to this Indictment, LUIS ROMAN,
JUSTINIANO VAZQUEZ, ANGEL VASQUEZ, WILLIE WADE, ALVIN BLANKSON,
DWAYNE MANN, JOHNNY JONES, LEANDER WILLIAMS, MALIK TEEL, QUADIR
BARNES, STACEY MOORE, TRACY MAINOR, ROZZION FOXX, YAKYRA HICKSON,
NYANTEE DAVIS, CHEZ HODGES, TYNISHA MOORE, ALICIA HOLLOWAY,
SHANTA BARNES, Ann Marie Roman, who is specifically named as a
co-conspirator but not as a defendant herein, and others whose
identities are known and unknown to the Grand Jurors, were
members or associates of a criminal enterprise involved in

bribery and the smuggling of electronic communications devices, narcotics and other contraband into the New Jersey State Prison system. These individuals, including its leadership, membership, and associates, constitute an "enterprise," within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, engaged in, or the activities of which affected trade or commerce in the State of New Jersey.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise include, but are not limited to, obtaining financial advantage through the smuggling of electronic communications devices, controlled dangerous substances, and other contraband into the New Jersey State Prison system, and through the laundering of money obtained through the smuggling of contraband to conceal illegal activities.

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 activity, including Bribery in Official Matters (N.J.S.A. 2C:27-2), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Money Laundering (N.J.S.A. 2C:21-25), or conspiracies or attempts to commit these crimes as described herein and in this Indictment.

LUIS ROMAN

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters, and Money Laundering, which racketeering conduct is the subject of Counts 3, 12 through 33 and 38 through 63 of this Indictment.

JUSTINIANO VAZQUEZ

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 23 through 25, 52, 59, 62, and 63 of this Indictment.

ANGEL VASQUEZ

did commit the racketeering conduct by engaging in or conspiring to commit the crime of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 23 through 25, 62, and 63 of this Indictment.

WILLIE WADE

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 6, and 59 of this Indictment.

ALVIN BLANKSON

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 5, and 57 of this Indictment.

DWAYNE MANN

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 8, and 52 of this Indictment.

JOHNNY JONES

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 4, and 45 of this Indictment.

LEANDER WILLIAMS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 11, and 54 of this Indictment.

MALIK TEEL

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 10, and 44 of this Indictment.

QUADIR BARNES

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 9, 50, and 60 of this Indictment.

STACEY MOORE

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 7, and 43 of this Indictment.

TRACY MAINOR

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 6, and 59 of this Indictment.

ROZZION FOXX

did commit the racketeering conduct by engaging in or conspiring to commit the crime of Conspiracy, which racketeering conduct is the subject of Count 3 of this Indictment.

YAKYRA HICKSON

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 4, and 45 of this Indictment.

NYANTEE DAVIS

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 5, and 57 of this Indictment.

CHEZ HODGES

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 10, and 44 of this Indictment.

TYNISHA MOORE

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 7, and 43 of this Indictment.

ALICIA HOLLOWAY

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters and Money Laundering, which racketeering conduct is the subject of Counts 3, 8, and 52 of this Indictment.

SHANTA BARNES

did commit the racketeering conduct by engaging in or conspiring to commit the crimes of Conspiracy, Bribery in Official Matters

and Money Laundering, which racketeering conduct is the subject of Counts 3, 9, 50, and 60 of this Indictment.

All in violation of N.J.S.A. 2C:5-2, 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

(Official Misconduct - Second Degree)

LUIS ROMAN

between on or about August 27, 2007, and on or about November 14, 2009, at the Township of Woodbridge, at the City of Perth Amboy, and at the Township of North Brunswick, all in the County of Middlesex, at the City of Newark, and at the Township of Nutley, both in the County of Essex, at the City of Linden, in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, being a public servant in his capacity as a sworn law enforcement officer, that is, a Corrections Officer with the New Jersey Department of Corrections, and having thereby the official functions and duties among others to display good faith, honesty and integrity, to be impervious to corrupting influences and to refrain from soliciting or accepting from any person anything of value for the performance of or for refraining from the performance of his duties or for violation thereof, and acting with a purpose to obtain a benefit for himself, did commit unauthorized acts relating to his pubic office and did refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, that is, the said LUIS ROMAN did accept money in exchange for the smuggling and transfer of wireless telephones, narcotics, and other contraband into Northern State Prison and

the Adult Diagnostic Treatment Center, both State Correctional facilities, and in so doing, the said LUIS ROMAN refrained from taking law enforcement action designed to prevent those crimes from occurring, 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.

COUNT THREE

(Conspiracy - Second Degree)

LUIS ROMAN

JUSTINIANO VAZQUEZ

ANGEL VASQUEZ

WILLIE WADE

ALVIN BLANKSON

DWAYNE MANN

JOHNNY JONES

LEANDER WILLIAMS

MALIK TEEL

QUADIR BARNES

STACEY MOORE

TRACY MAINOR

ROZZION FOXX

YAKYRA HICKSON

NYANTEE DAVIS

CHEZ HODGES

TYNISHA MOORE

ALICIA HOLLOWAY

and

SHANTA BARNES

and other individuals 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 August 27, 2007, and on or about November 14, 2009, at the Township of Woodbridge, at the City of Perth Amboy, and at the Township of North Brunswick, all in the County of Middlesex, at the City of Bridgeton, in the County of Cumberland, at the Township of Middle Township, in the County of Cape May, at the City of Newark, at the Township of Bloomfield, at the Township of Montclair, and at the Township of Nutley, all in the County of Essex, at the Borough of Fair Lawn, in the County of Bergen, at the City of Paterson, in the County of Passaic, at the City of Millville, in the County of Cumberland, at the Township of Ewing, in the County of Mercer, at the City of Elizabeth, and at the City of Linden, both in the County of Union, at the Town of West New York, and at the City of Jersey City, both in the County of Hudson, at the City of Beverly, in the County of Burlington, at the City of Somers Point, in the County of Atlantic, in the State of New York, in the State of Florida, in the Commonwealth of Pennsylvania, in the State of Connecticut, in the State of Wisconsin, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of bribery, unlawful transfer of certain electronic devices in a

correctional facility, and distribution of controlled dangerous substances, did agree 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 said crimes, that is:
- 1. Knowingly to directly or indirectly offer, confer or agree to confer, or solicit, accept or agree to accept, a benefit in excess of \$200, to or by a public servant as consideration for the violation of an official duty of the said public servant, contrary to the provisions of N.J.S.A. 2C:27-2c.
- 2. Knowingly to use an employee of the New Jersey Department of Corrections, to sell, transfer, assign, provide or otherwise give electronic communication devices to persons confined in a State correctional facility, contrary to the provisions of N.J.S.A. 2C:29-10d.
- 3. Knowingly or purposely to distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3).
- 4. Knowingly or purposely to distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3).

5. Knowingly or purposely to distribute a controlled dangerous substance, that is, marijuana, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(12).

All in violation of $\underline{\text{N.J.S.A.}}$ 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNTS FOUR THROUGH TEN

(Bribery in Official Matters - Second Degree)

WILLIE WADE

ALVIN BLANKSON

DWAYNE MANN

JOHNNY JONES

MALIK TEEL

QUADIR BARNES

STACEY MOORE

TRACY MAINOR

YAKYRA HICKSON

NYANTEE DAVIS

CHEZ HODGES

TYNISHA MOORE

ALICIA HOLLOWAY

and

SHANTA BARNES

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 Corrections Officer LUIS ROMAN a benefit in excess of \$200.00, as set forth herein, as consideration for the violation of an official duty of the said public servant, that is, the smuggling and transfer of wireless telephones, controlled dangerous substances, and

other contraband into Northern State Prison and the Adult Diagnostic Treatment Center, all as set forth herein:

Coun	t Defendant(s)	Date(s)	Municipality/ County	Amount
4	JOHNNY JONES and	6/5/09 to		Amount \$300
	YAKYRA HICKSON	7/5/09	of Bergen, City of Paterson,	1
			County of Passaic, City of	
	·		Newark, County of Essex,	
			State of New York	
5	ALVIN BLANKSON and	9/25/09	Township of Woodbridge,	\$600
	NYANTEE DAVIS	to	County of Middlesex, City of	
		10/31/09	Newark, County of Essex,	
			State of New York	
6	WILLIE WADE and	9/27/09	City of Jersey City, County	\$1,125
	TRACY MAINOR	to	of Hudson, City of Newark,	
	·	11/8/09	County of Essex, State of	
			New York	
7	STACEY MOORE and	4/1/09 to	City of Linden, County of	\$2,500
	TYNISHA MOORE	8/31/09	Union, Township of	
			Woodbridge, County of	
		·	Middlesex, City of Newark,	
			County of Essex	
8	DWAYNE MANN and	9/12/09	City of Newark, County of	\$800
	ALICIA HOLLOWAY	to	Essex, State of New York	
		11/30/09		
9	QUADIR BARNES and	7/7/09 to	Township of Bloomfield, City	\$600
	SHANTA BARNES	10/31/09	of Newark, both in the	
			County of Essex	İ
10	MAILIK TEEL and	4/29/09	City of Elizabeth, County of	\$5,000
-	CHEZ HODGES	to 7/3/09	Union, City of Newark,	
			County of Essex	

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

COUNT ELEVEN

(Bribery in Official Matters - Third Degree)

LEANDER WILLIAMS

on or about September 16, 2009, at the City of Newark, in the County of Essex, at the Township of North Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer or agree to confer upon Corrections Officer LUIS ROMAN a benefit, that is, \$200.00 in U.S. currency, as consideration for the violation of an official duty of the said public servant, that is, the smuggling and transfer of wireless telephones, controlled dangerous substances, and other contraband into Northern State Prison, contrary to the provisions of N.J.S.A. 2C:27-2c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNTS TWELVE THROUGH TWENTY-EIGHT

(Bribery in Official Matters - Second Degree)

·LUIS ROMAN

JUSTINIANO VAZQUEZ

and

ANGEL VASQUEZ

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly solicit, accept, or agree to accept from another, a benefit, that is, U.S. currency in an amount greater than \$200.00, as consideration for a violation of an official duty of a public servant, that is, the smuggling and transfer of wireless telephones, narcotics and other contraband into Northern State Prison and the Adult Diagnostic Treatment Center by Corrections Officer LUIS ROMAN, all as set forth herein:

Count	Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
12	LUIS ROMAN	8/27/07	City of Perth Amboy, and	\$500
		,	Township of Woodbridge,	(DeGarcia)
			both in the County of	
			Middlesex, State of New	
			York	
13	LUIS ROMAN	9/14/07	City of Bridgeton, County	\$1,350
		to	of Cumberland, Township of	(Mumin)
		12/14/07	Woodbridge, County of	
			Middlesex, State of New	
			York	

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	Count	Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
	14	LUIS ROMAN	9/11/07	Township of Middle	\$500
			to	Township, County of Cape	(Bordo)
			11/3/07	May, Township of	İ
				Woodbridge, County of	
				Middlesex, State of New	
				York	
	15	LUIS ROMAN	6/5/09 to	Borough of Fair Lawn,	\$300
			7/5/09	County of Bergen, City of	(Jones)
				Paterson, County of	
		,		Passaic, City of Newark,	
				County of Essex, State of	
				New York	
	16	LUIS ROMAN	6/8/09 to	City of Newark, County of	\$680
			6/27/09	Essex, State of Florida,	(Angel Rivera)
				State of New York	
	17	LUIS ROMAN	7/7/09 to	City of Elizabeth, County	\$400
			7/10/09	of Union, City of Newark,	(Washington)
				County of Essex, State of	
				New York	
	18	LUIS ROMAN	9/21/09	City of Newark, County of	\$300
·			to	Essex, Commonwealth of	(Bruno)
		·	9/23/09	Pennsylvania, State of New	
				York	
	19	LUIS ROMAN	9/17/09	Town of West New York,	\$550
			to	County of Hudson, City of	(Lascano)
	j		9/24/09	Newark, County of Essex,	
				State of New York	
	20	LUIS ROMAN	9/27/09	City of Beverly, County of	\$220
			to	Burlington, City of	(Powell)
,			9/28/09	Newark, County of Essex,	
				State of New York	

Count	Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
21	LUIS ROMAN	10/6/09	City of Newark, County of	\$300
		to	Essex, State of New York	(Thompson)
		10/8/09		
22	LUIS ROMAN	9/25/09	Township of Woodbridge,	\$600
		to	County of Middlesex, City	(Blankson)
		10/31/09	of Newark, County of	
			Essex, State of New York	
23	LUIS ROMAN,	9/27/09	City of Jersey City,	\$1,125
	JUSTINIANO VAZQUEZ,	to	County of Hudson, City of	(Wade)
	and ANGEL VASQUEZ	11/8/09	Newark, County of Essex,	
			State of New York	·
24	LUIS ROMAN,	11/2/09	City of Newark, County of	\$275
	JUSTINIANO VAZQUEZ,	to	Essex, State of	(Broche)
	and ANGEL VASQUEZ	11/3/09	Connecticut, State of New	
			York	
25	LUIS ROMAN,	11/4/09	City of Newark, County of	\$350
	JUSTINIANO VAZQUEZ,	to	Essex, State of New York	(Robinson)
	and ANGEL VASQUEZ	11/5/09		
26	LUIS ROMAN	4/1/09 to	City of Linden, County of	\$2,500
		8/31/09	Union, Township of	(Moore)
			Woodbridge, County of	
			Middlesex, City of Newark,	
			County of Essex	
27	LUIS ROMAN	9/12/09	City of Newark, County of	\$800
		to	Essex, State of New York	(Mann)
		11/30/09		
28	LUIS ROMAN	7/1/09 to	City of Somers Point,	\$600
		11/30/09	County of Atlantic, City	(Gallagher)
		į	of Newark, County of Essex	

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

COUNTS TWENTY-NINE THROUGH THIRTY-THREE

(Bribery in Official Matters - Third Degree) LUIS ROMAN

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly solicit, accept, or agree to accept from another, a benefit, that is, U.S. currency in an amount of \$200.00 or less, as consideration for a violation of an official duty of a public servant, that is, the smuggling and transfer of wireless telephones, narcotics and other contraband into Northern State Prison by Corrections Officer LUIS ROMAN, all as set forth herein:

Count	Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
29	LUIS ROMAN	2/5/08	City of Newark, County of	\$100
			Essex, Township of	(Hardgrove)
		1	Woodbridge, County of	
		l.	Middlesex, State of New York	
30	LUIS ROMAN	6/22/09	City of Millville, County of	\$200
		to	Cumberland, City of Newark,	(Heredia)
		6/27/09	County of Essex, State of	·
			New York	
31	LUIS ROMAN	7/6/09 to	Township of Ewing, County of	\$50
		7/16/09	Mercer, City of Newark,	(Daniels)
			County of Essex, State of	
			New York	
32	LUIS ROMAN	9/16/09	Township of North Brunswick,	\$200
			County of Middlesex	(Williams)

Count	Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
33	LUIS ROMAN	1/1/09 to	City of Elizabeth, County of	\$100
		6/30/09	Union, City of Newark,	(Montano)
			County of Essex	

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

COUNT THIRTY-FOUR

(Unlawful Transfer of Certain Electronic Devices in Correctional Facilities - Second Degree)

LUIS ROMAN

on or about June 14, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, being an employee of the New Jersey Department of Corrections, knowingly did sell, transfer, assign, provide or otherwise give electronic communication devices, that is, seven wireless telephones, to Allen Rivera, a person confined in Northern State Prison, a State correctional facility, contrary to the provisions of N.J.S.A. 2C:29-10d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Unlawful Transfer of Certain Electronic Devices in Correctional Facilities - Second Degree)

LUIS ROMAN

in or about July 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, being an employee of the New Jersey Department of Corrections, knowingly did sell, transfer, assign, provide or otherwise give an electronic communication device, that is, a wireless telephone, to Carlos Molina, a person confined in Northern State Prison, a State correctional facility, contrary to the provisions of N.J.S.A. 2C:29-10d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

(Unlawful Transfer of Certain Electronic Devices in Correctional Facilities - Second Degree)

LUIS ROMAN

on or about October 6, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, being an employee of the New Jersey Department of Corrections, knowingly did sell, transfer, assign, provide or otherwise give an electronic communication device, that is, a wireless telephone, to Earlest Gordon, a person confined in Northern State Prison, a State correctional facility, contrary to the provisions of N.J.S.A. 2C:29-10d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SEVEN

(Distribution of a Controlled Dangerous Substance - Fourth Degree)

LUIS ROMAN

on or about November 14, 2009, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, marijuana, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(12), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNTS THIRTY-EIGHT THROUGH SIXTY-THREE

(Money Laundering - Third Degree)

LUIS ROMAN

JUSTINIANO VAZQUEZ

ANGEL VASQUEZ

WILLIE WADE

ALVIN BLANKSON

DWAYNE MANN

JOHNNY JONES

LEANDER WILLIAMS

MALIK TEEL

QUADIR BARNES

STACEY MOORE

YAKYRA HICKSON

NYANTEE DAVIS

CHEZ HODGES

TYNISHA MOORE

ALICIA HOLLOWAY

and

SHANTA BARNES

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known or which a reasonable person would believe to be derived from criminal activity; or did engage in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity with intent to facilitate or promote the criminal activity, or knowing that the said transaction was designed in whole or in part to conceal or disguise the nature of the nature, location, source, ownership or control of the property derived from criminal activity, all as set forth herein:

Count	Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
38	LUIS ROMAN	8/27/07	City of Perth Amboy,	\$500
			and Township of	(DeGarcia)
			Woodbridge, both in	
			the County of	
			Middlesex, State of	
			New York	
39	LUIS ROMAN	9/11/07	Township of Middle	\$5.00
		to	Township, County of	(Bordo)
		11/3/07	Cape May, Township of	
	·		Woodbridge, County of	
			Middlesex, State of	
			New York	
40	LUIS ROMAN	9/14/07	City of Bridgeton,	\$1,350
		to	County of Cumberland,	(Mumin)
		12/14/07	Township of	
			Woodbridge, County of	
			Middlesex, State of	
			New York	

Count	Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
41	LUIS ROMAN	2/5/08	City of Newark,	\$100
			County of Essex,	(Hardgrove)
			Township of	
			Woodbridge, County of	
			Middlesex, State of	
			New York	
42	LUIS ROMAN	1/1/09 to	City of Elizabeth,	\$100
		6/30/09	County of Union, City	(Montano)
			of Newark, County of	
			Essex	
43	STACEY MOORE,	4/1/09 to	City of Linden,	\$2,500
	TYNISHA MOORE, and	8/31/09	County of Union,	(TYNISHA MOORE)
	LUIS ROMAN		Township of	
			Woodbridge, County of	
			Middlesex, City of	
			Newark, County of	
			Essex	
44	MAILIK TEEL,	4/29/09	City of Elizabeth,	\$5,000
	CHEZ HODGES, and	to 7/3/09	County of Union, City	(CHEZ HODGES)
	LUIS ROMAN		of Newark, County of	
			Essex	
45	JOHNNY JONES,	6/5/09 to	Borough of Fair Lawn,	\$300
	YAKYRA HICKSON, and	7/5/09	County of Bergen,	(YAKYRA HICKSON)
	LUIS ROMAN	İ	City of Paterson,	
			County of Passaic,	
		ł	City of Newark,	
			County of Essex,	
			State of New York	

Coun	t Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
46	LUIS ROMAN	6/8/09 to	City of Newark,	\$680
		6/27/09	County of Essex,	(Angel Rivera)
			State of Florida,	
			State of New York	
47	LUIS ROMAN	6/22/09	City of Millville,	\$200
		to	County of Cumberland,	(Heredia)
		6/27/09	City of Newark,	
			County of Essex,	
			State of New York	
48	LUIS ROMAN	7/6/09 to	Township of Ewing,	\$50
		7/16/09	County of Mercer,	(Daniels)
			City of Newark,	
			County of Essex,	
			State of New York	
49	LUIS ROMAN	7/7/09 to	City of Elizabeth,	\$400
		7/10/09	County of Union, City	(Washington)
			of Newark, County of	
			Essex, State of New	
			York	
50	QUADIR BARNES,	7/7/09 to	Township of	.\$600
	SHANTA BARNES, and	10/31/09	Bloomfield, and City	(SHANTA BARNES)
	LUIS ROMAN		of Newark, both in	
			the County of Essex	
51	LUIS ROMAN	9/12/09	City of Newark,	\$800
		to	County of Essex,	(Mann)
		11/30/09	State of New York	
52	DWAYNE MANN, ALICIA	9/12/09	City of Newark,	\$800
	HOLLOWAY, JUSTINIANO	to	County of Essex,	(ALICIA HOLLOWAY)
	VAZQUEZ,	11/30/09	State of New York	
<u></u> j	and LUIS ROMAN			

Count	Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
53	LUIS ROMAN	9/16/09	Township of North	\$200
			Brunswick, County of	(Williams)
			Middlesex	
54	LEANDER WILLIAMS,	9/16/09	City of Newark,	\$200
	and LUIS ROMAN		County of Essex,	(Tonya Foxx)
			Township of North	
			Brunswick, County of	
			Middlesex	
55	LUIS ROMAN	9/17/09	Town of West New	\$550
		to	York, County of	(Lascano)
		9/24/09	Hudson, City of	
			Newark, County of	
			Essex, State of New	
			York	
56	LUIS ROMAN	9/21/09	City of Newark,	\$300
	•	to	County of Essex,	(Bruno)
		9/23/09	Commonwealth of	
			Pennsylvania, Štate	
			of New York	
57	ALVIN BLANKSON,	9/25/09	Township of	\$600
	NYANTEE DAVIS, and	to	Woodbridge, County of	(NYANTEE DAVIS)
	LUIS ROMAN	10/31/09	Middlesex, City of	
			Newark, County of	
			Essex, State of New	
			York	
58	LUIS ROMAN	9/27/09	City of Beverly,	\$220
		to	County of Burlington,	(Powell)
		9/28/09	City of Newark,	
			County of Essex,	
			State of New York	

Count	Defendant(s)	Date(s)	Municipality/ County	Amount (Payor)
59	WILLIE WADE,	9/27/09	City of Jersey City,	\$1,125
	TRACY MAINOR,	to	County of Hudson,	(TRACY MAINOR)
	JUSTINIANO VAZQUEZ,	11/8/09	City of Newark,	
	and LUIS ROMAN		County of Essex,	
			State of New York	
60	LUIS ROMAN,	9/30/09	Township of	\$100
	QUADIR BARNES,	to	Bloomfield, City of	(SHANTA BARNES)
	and SHANTA BARNES	10/31/09	Newark, both in	
			County of Essex	
61	LUIS ROMAN	10/6/09	City of Newark,	\$300
		to	County of Essex,	(Thompson)
		10/8/09	State of New York	
62	LUIS ROMAN,	11/2/09	City of Newark,	\$275
	JUSTINIANO VAZQUEZ,	to	County of Essex,	(Broche)
	and ANGEL VASQUEZ	11/3/09	State of Connecticut,	
			State of New York	
63	LUIS ROMAN,	11/4/09	City of Newark,	\$350
	JUSTINIANO VAZQUEZ,	to	County of Essex,	(Robinson)
	and ANGEL VASQUEZ	11/5/09	State of New York	

contrary to the provisions of <u>N.J.S.A.</u> 2C:21-25a, <u>N.J.S.A.</u> 2C:21-25b(1), <u>N.J.S.A.</u> 2C:21-25b(2)(a), and <u>N.J.S.A.</u> 2C:2-6, and

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

AAG Stephen

Directo

NJ Division of Criminal Justice

A TRUE BILL:

Forenerson

Date: 9/15/2010

SEP 2 2 2010

SUPERIOR COURT CLERK'S OFFICE

SEP 1 5 2010

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

SUPERIOR COURT CLEAN'S OFFICE te Grand Jury

Number <u>SGJ593-10-5</u>

Superior Court Docket Number 10-09-00116-5

STATE OF NEW JERSEY)	
v.)	ORDER OF VENUE
LUIS ROMAN)	•
a/k/a "KING KONG" a/k/a "PIPI" a/k/a "RO")	
a/k/a "PIG" a/k/a "PP")	
JUSTINIANO VAZQUEZ)	
a/k/a "JUSTO VASQUEZ" a/k/a "JUSTLIANO VASQUEZ" a/k/a "JUSINIANO VASQUEZ")	
ANGEL VASQUEZ a/k/a "A")	
a/k/a A)	
WILLIE WADE	,	
a/k/a "NORMAN" a/k/a "NORM")	
a/k/a "WILL")	
ALVIN BLANKSON)	
a/k/a "NATTY DAVIS" a/k/a "P.U.")	
DWAYNE MANN		
a/k/a "NEW YORK")	
JOHNNY JONES a/k/a "Z")	
a/k/a Z a/k/a "ZAR")	
a/k/a "CZAR"	,	
THANDED MILLIAMS)	
LEANDER WILLIAMS a/k/a "SHA")	
a/k/a "SHALEIK"	1	
MALIK TEEL,)	
a/k/a "REDS" a/k/a "TEEL")	

QUADIR BARNES a/k/a "Q")
)
STACEY MOORE a/k/a "PIKE")
TRACY MAINOR a/k/a "MISSY")
ROZZION FOXX)
)
YAKYRA HICKSON)
NYANTEE DAVIS	,
CHEZ HODGES)
TYNISHA MOORE)
ALICIA HOLLOWAY)
IIII IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII)
and	١
SHANTA BARNES)

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

IT IS ORDERED on this Say of Mule, 2010, pursuant to paragraph 8 of the State Grand Sury Act, that the County of 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 Courtshall 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.

Edward M. Neafsey, J.S.C.