

FILED

AUG 6 - 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ621-12-10

Superior Court

Docket Number 12-08-00146-3

STATE OF NEW JERSEY

v.

DANNI RIVERA,
AKA "DINOBLE,"

ISIS RIVERA
AKA "ICHY"

JESUS CRIADO

WILLIAM SUAREZ
AKA "PACHU,"

ELIGIO BUENO
AKA "JUNE,"

ANDRE OCASIO

DAMIEN CASTRO

RICHARD ORENGO

ROY REMEGGIO

ANTONIO MARTINEZ

HECTOR DELVALLE

JONATHAN NIEVES

ALEXANDER COSME

JOSUE SANTIAGO

WILLIE BROWN

ALEXANDER ROSARIO

INDICTMENT

DAVID RIVERA)
WILLIAM GONZALEZ)
JACQUELINE DEVARGAS)
CAROL RIVERA)
DEBRA CONROY)
MARIO FLORES)
DORA FIGUEROA)
MONA ALPHONSE)
CARMEN ZEPEDA)
ROSALEE HOWARD)
MARIA DEL CID)
ALBERTO MELENDEZ)
JUFRANIA BLANCO)
THOMAS STUHRMANN)
and)
VERONICA MARTINEZ)

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

COUNT ONE

(Racketeering - First Degree)

DANNI RIVERA

ISIS RIVERA

JESUS CRIADO

WILLIAM SUAREZ

ELIGIO BUENO

DAMIEN CASTRO
ANDRE OCASIO
RICHARD ORENGO
ANTONIO MARTINEZ
HECTOR DELVALLE
JONATHAN NIEVES
ALEXANDER COSME
JOSUE SANTIAGO
WILLIE BROWN
ALEXANDER ROSARIO
DAVID RIVERA
WILLIAM GONZALEZ
JACQUELINE DEVARGAS
CAROL RIVERA
DEBRA CONROY
MARIO FLORES
DORA FIGUEROA
MONA ALPHONSE
CARMEN ZEPEDA
ROSALEE HOWARD
MARIA DEL CID
ALBERTO MELENDEZ
JUFRANIA BLANCO
THOMAS STUHRMANN
and
VERONICA MARTINEZ

and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not 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 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 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

1. The predicate criminal activity occurred between in or about January, 2007, and in on or about January, 2012.

THE RELEVANT PLACES

2. The predicate criminal activity took place at the City of Perth Amboy, the Borough of Carteret, the Township of Woodbridge, all in the County of Middlesex, in the City of Newark, in the Township of Irvington, both in the County of Essex, at the City of Trenton, in the County of Mercer, in the City of Camden, in the County of Camden, in the City of Elizabeth, in the County of Union, in the State of New York, in the State of California, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

At all times relevant to this Indictment, DANNI RIVERA, ISIS RIVERA, JESUS CRIADO, RICHARD ORENGO, ANTONIO MARTINEZ, HECTOR DELVALLE, ALEXANDER COSME, WILLIAM SUAREZ, ELIGIO BUENO, JOSUE SANTIAGO, WILLIE BROWN, ALEXANDER ROSARIO, ANDRE OCASIO, JONATHAN NIEVES, DAMIEN CASTRO, JUFRANIA BLANCO, ROSALEE HOWARD, ALBERTO MELENDEZ, THOMAS STUHRMANN, DAVID RIVERA, WILLIAM GONZALES, JACQUELINE DEVARGAS, CAROL RIVERA, DEBRA CONROY, MARIO FLORES, DORA FIGUEROA, MONA ALPHONSE, CARMEN ZAPEDA, VERONICA MARTINEZ, and MARIA DEL CID all of whom are co-conspirators, and David Santana, Hector Montoya-Garay and Oswaldo Santillan, who are co-conspirators and members of the enterprise, but not charged in this indictment, and other persons whose identities are both known and unknown to the State Grand Jurors, would 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, among other names, members or associates thereof self identified as the Neta street gang, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise would include the maintenance of its strength and the assurance of its perpetuation through specific rules and protocols applicable to its members and associates, including: discussing matters pertaining to the operation, conduct and control of the enterprise with no one other than members or highly trusted associates of the enterprise; resolving disputes or seeking direction from superiors within the enterprise through a specific chain of command; enforcing the protocols of the enterprise through any means necessary, including threats or use of violence; keeping a member's immediate supervisor within the enterprise informed of illegal activities and law enforcement activities targeting the enterprise; collectively generating income on behalf of and for the benefit of the enterprise through various illicit schemes; and dividing proceeds from enterprise members' criminal activities in accordance with enterprise protocol. A further purpose of the enterprise would be to shield its operation from detection by law enforcement authorities by, among other means: using code names when communicating; resorting to in-person meetings; and using wireless telephones in fictitious or nominee names.

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 but not limited to: Leader of a Narcotics Trafficking Network (N.J.S.A. 2C:35-3), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Money Laundering (N.J.S.A. 2C:21-25), Kidnapping (N.J.S.A. 2C:13-1), Assault (N.J.S.A. 2C:12-1), Robbery (N.J.S.A. 2C:15-1), Forgery and fraudulent practices (N.J.S.A. 2C:21-1), Unlawful Possession of a Handgun (N.J.S.A. 2C:39-5), Possession of Weapons During Commission of Certain Crimes (N.J.S.A. 2C:39-4.1(a)) or conspiracies or attempts to commit these crimes, as described herein:

DANNI RIVERA

did commit the racketeering conduct by engaging in and or conspiring to commit the crimes of leader of a narcotics trafficking network, distribution of controlled dangerous substances, possession with intent to distribute a controlled dangerous substance, kidnapping, aggravated assault and money laundering, which racketeering conduct is the subject of Counts Two, Three, Five, Six, Eleven, Twelve, Thirteen, Sixteen and Nineteen of this Indictment.

ISIS RIVERA

did commit the racketeering conduct by engaging in and or conspiring to commit the crimes of money laundering and forgery, which racketeering conduct is the subject of Counts Eleven,

Twelve and Twenty-Eight of this Indictment.

JESUS CRIADO

did commit the racketeering conduct by engaging in and or conspiring to commit the crimes of possession with intent to distribute a controlled dangerous substance, unlawful possession of a hand gun, and possession of weapons during the commission of certain crimes, which racketeering conduct is the subject of Counts Two, Twenty-Five, Twenty-Six and Twenty-Seven of this Indictment.

WILLIAM SUAREZ

did commit the racketeering conduct by engaging in and or conspiring to commit the crimes of distribution of a controlled dangerous substance and money laundering, which racketeering conduct is the subject of Counts Two, Eleven, and Twelve of this Indictment.

ELIGIO BUENO

did commit the racketeering conduct by engaging in and or conspiring to commit the crimes of distribution of a controlled dangerous substance and money laundering, which racketeering conduct is the subject of Counts Two, Eleven, and Twelve of this Indictment.

DAMIEN CASTRO

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of robbery, which racketeering conduct is the subject of Counts Seven and Eight of this Indictment.

RICHARD ORENGO

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of robbery, which racketeering conduct is the subject of Counts Seven and Eight of this Indictment.

ANTONIO MARTINEZ

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of distribution of a controlled dangerous substance, which racketeering conduct is the subject of Counts Two and Sixteen of this Indictment.

HECTOR DELVALLE

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of distribution of a controlled dangerous substance, which racketeering conduct is the subject of Counts Two and Nineteen of this Indictment.

ALEXANDER COSME

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of possession with intent to distribute a controlled dangerous substance, which racketeering conduct is the subject of Counts Two and Twenty of this Indictment.

JOSUE SANTIAGO

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of possession of a controlled dangerous substance, which racketeering conduct is the subject of Counts Two and Twenty-Two of this Indictment.

ANDRE OCASIO

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of distribution of a controlled dangerous substance, which racketeering conduct is the subject of Count Two of this Indictment.

JONATHAN NIEVES

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of distribution of a controlled dangerous substance, which racketeering conduct is the subject of Count Two of this Indictment.

WILLIE BROWN

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of distribution of a controlled dangerous substance, which racketeering conduct is the subject of Count Two of this Indictment.

ALEXANDER ROSARIO

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of distribution of a controlled dangerous substance, which racketeering conduct is the subject of Count Two of this Indictment.

JUFRANIA BLANCO

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of possession with intent to distribute a controlled dangerous substance, which racketeering conduct is the subject of Counts Two and Twenty-Three of this Indictment.

ROSALEE HOWARD

did commit the racketeering conduct by engaging in and or conspiring to commit the crimes of distribution of a controlled dangerous substance and money laundering, which racketeering conduct is the subject of Counts Two and Twelve of this Indictment.

ALBERTO MELENDEZ

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of distribution of a controlled dangerous substance, which racketeering conduct is the subject of Count Two of this Indictment.

THOMAS STUHRMANN

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of distribution of a controlled dangerous substance, which racketeering conduct is the subject of Count Two of this Indictment.

DAVID RIVERA

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve of this Indictment.

WILLIAM GONZALEZ

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve of this Indictment.

JACQUELINE DEVARGAS

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve of this Indictment.

CAROL RIVERA

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve of this Indictment.

DEBRA CONROY

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve of this Indictment.

MARIO FLORES

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve of this Indictment.

DORA FIGUEROA

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve of this Indictment.

MONA ALPHONSE

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve of this Indictment.

CARMEN ZAPEDA

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve of this Indictment.

VERONICA MARTINEZ

did commit the racketeering conduct by engaging in and or conspiring to commit the crimes of possession with intent to distribute a controlled dangerous substance, unlawful possession of a hand gun, and possession of weapons during the commission of certain crimes, which racketeering conduct is the subject of Counts Two, Twenty-Five, Twenty-Six and Twenty-Seven of this Indictment.

MARIA DEL CID

did commit the racketeering conduct by engaging in and or conspiring to commit the crime of money laundering, which racketeering conduct is the subject of Counts Eleven and Twelve 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

(Conspiracy - Second Degree)

DANNI RIVERA

JESUS CRIADO

WILLIAM SUAREZ

ELIGIO BUENO

ANDRE OCASIO

RICHARD ORENGO

ANTONIO MARTINEZ

HECTOR DELVALLE

JONATHAN NIEVES

ALEXANDER COSME

JOSUE SANTIAGO

WILLIE BROWN

ALEXANDER ROSARIO

JUFRANIA BLANCO

ROSALEE HOWARD

ALBERTO MELENDEZ

THOMAS STURHMANN

and

VERONICA MARTINEZ

between in or about January, 2007, and in or about January 2012,
at the City of Perth Amboy, in the Borough of Carteret, and in
the Township of Woodbridge, all in the County of Middlesex, in
the City of Newark, in the County of Essex, in the City of
Trenton, in the County of Mercer, elsewhere, and within the

jurisdiction of this 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 possession of a controlled dangerous substance, did agree 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 controlled dangerous substances, that is, heroin and 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 controlled dangerous substances, that is, heroin and 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 or purposely to possess controlled dangerous substances, that is, heroin and cocaine, contrary to the provisions of N.J.S.A. 2C:35-10a(1).

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 THREE

(Leader of a Narcotics Trafficking Network - First Degree)

DANNI RIVERA

between on or about January 1, 2007, and on or about August 30, 2011, at the City of Perth Amboy, in the Borough of Carteret, at the Township of Woodbridge, all in the County of Middlesex, in the City of Newark, in the County of Essex, in the City of Trenton, in the County of Mercer, 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 distribute, dispense, bring into or transport in this State controlled dangerous substances, that is, heroin, cocaine and marijuana, all controlled dangerous substances, 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 FOUR

(Conspiracy - Second Degree)

DANNI RIVERA

and David Santana, Oswaldo Santillan, Jr., and Hector Montoya-Garay, who are named as coconspirators but not as defendants herein, on or about December 5, 2009, at the City of Perth Amboy, and at the Borough of Sayreville, both in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of kidnapping, did agree that:

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

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

1. Knowingly or purposely did remove Juan Avalos a substantial distance from 546 Jacques Street, in the City of Perth Amboy, and/or unlawfully confine Juan Avalos for a substantial period, with the purpose to inflict bodily injury and/or terrorize him, contrary to the provisions of N.J.S.A. 2C:13-1b(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 FIVE

(Kidnapping - First Degree)

DANNI RIVERA

and David Santana, Oswaldo Santillan, Jr., and Hector Montoya-Garay who are named as coconspirators but not as defendants herein, between on or about December 5, 2009, and December 6, 2009, at the City of Perth Amboy, and at the Borough of Sayreville, both in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did remove Juan Avalos a substantial distance from 546 Jacques Street, in the City of Perth Amboy, and/or unlawfully did confine Juan Avalos for a substantial period, with the purpose to inflict bodily injury and/or terrorize him, contrary to the provisions of N.J.S.A. 2C:13-1b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Aggravated Assault - Second Degree)

DANNI RIVERA

and David Santana and Oswaldo Santillian, Jr., who are named as coconspirators but not as defendants herein, on or about December 5, 2009, at the City of Perth Amboy, and at the Borough of Sayreville, both in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did attempt to cause serious bodily injury, and/or knowingly or purposely did cause serious bodily injury to Juan Avalos, contrary to the provisions of N.J.S.A. 2C:12-1b(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Conspiracy - Second Degree)

DAMIEN CASTRO

and

RICHARD ORENGO

on or about March 9, 2011, at the City of Perth Amboy, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of robbery, did agree 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. Knowing or purposely did knowingly inflict bodily injury or use force upon Noel Perez, or threatened Noel Perez with or purposely put him in fear of immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-1 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 EIGHT

(Robbery - Second Degree)

DAMIEN CASTRO

and

RICHARD ORENGO

on or about March 9, 2011, at the City of Perth Amboy, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, while in the course of committing a theft from the person of Noel Perez, did knowingly inflict bodily injury or use force upon Noel Perez, or threatened Noel Perez with or purposely put him in fear of immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Conspiracy - Second Degree)

ROY REMIGIO

and

RICHARD ORENGO

and others whose identities are unknown, between, on or about March 9, 2011, and May 30, 2011, at the City of Perth Amboy, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of tampering with a witness, did agree 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. Believing that an official proceeding or investigation was pending, or was about to be instituted, knowingly or purposely engaged in conduct which a reasonable person would believe would cause a witness, to wit: Noel Perez, to either testify or inform falsely or withhold any testimony or information, contrary to the provisions of N.J.S.A. 2C:28-5a.

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 TEN

(Tampering with a Witness - Second Degree)

ROY REMIGIO

and

RICHARD ORENGO

and others whose identities are unknown between, on or about March 9, 2011 and June 14, 2011, at the City of Perth Amboy, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending, or was about to be instituted, knowingly engaged in conduct which a reasonable person would believe would cause a witness, to wit: Noel Perez, to either testify or inform falsely or withhold any testimony or information, contrary to the provisions of N.J.S.A. 2C:28-5a, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Conspiracy - Third Degree)

DANNI RIVERA

ISIS RIVERA

WILLIAM SUAREZ

ELIGIO BUENO

DAVID RIVERA

WILLIAM GONZALEZ

JACQUELINE DEVARGAS

CAROL RIVERA

DEBRA CONROY

MARIO FLORES

DORA FIGUEROA

MONA ALPHONSE

CARMEN ZEPEDA

ROSALEE HOWARD

and

MARIA DEL CID

between in or about January, 2007, and in or about January, 2012,
at the City of Perth Amboy, in the County of Middlesex, in the
City of Trenton, in the County of Mercer, in the City of Newark,
in the Township of Irvington, both in the County of Essex, in the
City of Camden, in the County of Camden, in the City of
Elizabeth, in the County of Union, in the State of New York, in
the State of California, elsewhere, and within the jurisdiction
of this Court, with the purpose of promoting or facilitating the

commission of the crime of money laundering, did agree 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 did transport or possess property known or which a reasonable person would believe to be derived from criminal activity, the aforesaid property being United States currency, contrary to the provisions of N.J.S.A. 2C:21-25a, b and/or c and N.J.S.A. 2C:21-27a,

2. Engaged in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity, with the intent to facilitate or promote the criminal activity or, knowing that the transaction was designed to conceal or disguise the nature location, source, ownership or control of the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b; or

3. Directed, organized financed, planned, managed, supervised or controlled the transportation of or transactions in property known or which a reasonable person would believe to be derived from criminal activity, the aforesaid property being United States currency, contrary to the provisions of N.J.S.A. 2C:21-25c.

The Grand Jurors aforesaid, upon their oaths, do further present that:

It was part of said conspiracy that WILLIAM SUAREZ and

ELIGIO BUENO, both of whom are inmates confined in New Jersey State Prison, would agree to pay DANNI RIVERA money in exchange for smuggling controlled dangerous substances into New Jersey State Prison.

It was further a part of said conspiracy that DANNI RIVERA would instruct ISIS RIVERA to collect money from inmates and/or inmates' family members or friends as payment for smuggling controlled dangerous substances into New Jersey State Prison.

It was further a part of said conspiracy that ISIS RIVERA, WILLIAM SUAREZ and/or MARIO FLORES would instruct DAVID RIVERA, WILLIAM GONZALEZ, JACQUELINE DEVARGAS, CAROL RIVERA, DEBRA CONROY, MARIO FLORES, DORA FIGUEROA, MONA ALPHONSE, CARMEN ZAPEDA, ROSALEE HOWARD and MARIA DEL CID to cash checks, money orders and other negotiable instruments that were mailed to them from inmates and/or inmates' family members or friends and to give ISIS RIVERA the United States currency.

It was further a part of said conspiracy that ISIS RIVERA and/or CAROL RIVERA would use money derived from criminal activity to pay living expenses for DANNI RIVERA, including but not limited to purchasing automobiles, paying monthly rent for housing, paying bills for telephone service, paying for car insurance and posting bail.

OVERT ACTS

The Grand Jurors aforesaid, upon their oaths, do further present that the following Overt Acts, among others, were

committed in furtherance of said conspiracy:

1. Between on or about April 1, 2011 and August 30, 2011 DANNI RIVERA and WILLIAM SUAREZ engaged in telephone conversations during which the two discussed ISIS RIVERA providing WILLIAM SUAREZ with the names and addresses of people willing to receive and cash checks, money orders and other negotiable instruments sent from inmates and/or inmates' family members or friends as payment for smuggling controlled dangerous substances into New Jersey State Prison.

2. Between on or about January 1, 2007 and August 30, 2011, DAVID RIVERA, WILLIAM GONZALEZ, JACQUELINE DEVARGAS, DEBRA CONROY, DORA FIGUEROA, MONA ALPHONSE, CARMEN ZAPEDA, ROSALEE HOWARD and MARIA DEL CID, all cashed checks, money orders and/or other negotiable instruments sent from New Jersey State Prison inmates and/or inmates' family members or friends as payment for smuggling controlled dangerous substances into New Jersey State Prison.

3. Between on or about January 1, 2007 and August 30, 2011 MARIO FLORES sent checks, money orders or other negotiable instruments to CARMEN ZAPEDA as payment for smuggling controlled dangerous substances into New Jersey State Prison.

4. Between on or about January 1, 2007 and August 30, 2011 WILLIAM SUAREZ sent checks, money orders or other negotiable instruments to ISIS RIVERA as payment for smuggling controlled dangerous substances into New Jersey State Prison.

5. Between on or about January 1, 2007 and August 30,

2011 ELIGIO BUENO sent checks, money orders or other negotiable instruments to JACQUELINE DEVARGAS as payment for smuggling controlled dangerous substances into New Jersey State Prison.

6. Between or about January 1, 2007 and August 30, 2011 CAROL RIVERA and DANNI RIVERA obtained Chase Bank automobile loan number 00524390112054 to purchase an automobile and paid the loan with criminal proceeds.

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 TWELVE

(Money Laundering - Third Degree)

DANNI RIVERA

ISIS RIVERA

WILLIAM SUAREZ

ELIGIO BUENO

DAVID RIVERA

WILLIAM GONZALEZ

JACQUELINE DEVARGAS

CAROL RIVERA

DEBRA CONROY

MARIO FLORES

DORA FIGUEROA

MONA ALPHONSE

CARMEN ZEPEDA

ROSALEE HOWARD

and

MARIA DEL CID

between in or about January 2007 and in or about January, 2012,
at the City of Perth Amboy, in the County of Middlesex, in the
City of Trenton, in the County of Mercer, in the City of Newark,
in the Township of Irvington, both in the County of Essex, in the
City of Camden, in the County of Camden, in the City of
Elizabeth, in the County of Union, in the State of New York, in
the State of California, elsewhere, and within the jurisdiction
of this Court, did

1. Transport or possess property known or which a reasonable person would believe to be derived from criminal activity, or

2. Engaged in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity, with the intent to facilitate or promote the criminal activity or, knowing that the transaction was designed to conceal or disguise the nature location, source, ownership or control of the property derived from criminal activity; or

3. Directed, organized financed, planned, managed, supervised or controlled the transportation of or transactions in property known or which a reasonable person would believe to be derived from criminal activity, the aforesaid property being United States currency, contrary to the provisions of N.J.S.A. 2C:21-25a, and/or N.J.S.A. 2C:21-25b and/or N.J.S.A. 2C:21-25c and N.J.S.A. 2C:21-27a, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

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

DANNI RIVERA

between on or about March 22, 2010, and March 23, 2010, at the Borough of Carteret in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is heroin, 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 against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Possession of a Controlled Dangerous Substance
with Intent to Distribute within 1,000 Feet of
School Property - Third Degree)

DANNI RIVERA

between on or about March 22, 2010 and March 23, 2010, at the Borough of Carteret, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of the Nathan Hale Elementary School, a public elementary school owned or leased by the Carteret Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Possession of a Controlled Dangerous Substance
with Intent to Distribute within 500 feet of
Certain Public Property - Second Degree)

DANNI RIVERA

between on or about March 22, 2010 and March 23, 2010, at the Borough of Carteret, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 500 feet of the Grant Avenue Park, a public park operated and maintained by the Borough of Carteret, contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Distribution of a Controlled Dangerous
Substance - Second Degree)

DANNI RIVERA

and

ANTONIO MARTINEZ

between, on or about March 30, 2011 and April 6, 2011, at the City of Perth Amboy, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in an aggregate quantity of at least one-half ounce but less than five ounces 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, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Distribution of a Controlled Dangerous Substance
within 1,000 feet of School Property - Third Degree)

DANNI RIVERA

and

ANTONIO MARTINEZ

on or about March 30, 2011 and April 6, 2011, at the City of Perth Amboy, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 1,000 feet of the William C. McGinnis Middle School, a public school owned or leased by the Perth Amboy Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Distribution of a Controlled Dangerous Substance within
500 feet of Certain Public Property - Second Degree)

DANNI RIVERA

and

ANTONIO MARTINEZ

between on or about March 30, 2011 and April 6, 2011, at the City of Perth Amboy, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 500 feet of Fink Park, a public park operated and maintained by the City of Perth Amboy and used for recreational purposes, contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Distribution of a Controlled Dangerous
Substance - Third Degree)

DANNI RIVERA

and

HECTOR DELVALLE

between, on or about July 29, 2011, at the Township of Woodbridge, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

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

ALEXANDER COSME

on or about July 16, 2011, at the at the Borough of Carteret in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Possession with Intent to Distribute a
Controlled Dangerous Substance on or within
1,000 feet of School Property - Third Degree)

ALEXANDER COSME

on or about July 16, 2011, at the City of Perth Amboy in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is heroin, a Schedule I controlled dangerous substance, within 1,000 feet of school property, that is the Dr. Herbert M. Richardson 21st Century Elementary School, a public school owned or leased by the Perth Amboy Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

JOSUE SANTIAGO

on or about July 16, 2011, at the City of Perth Amboy in the County of Middlesex, 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 TWENTY-THREE

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

JUFRANIA BLANCO

on or about March 28, 2011, at the at the City of Perth Amboy in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Possession of a Controlled Dangerous Substance
with Intent to Distribute within 500 feet of
Certain Public Property - Second Degree)

JUFRANIA BLANCO

on or about March 28, 2011, at the City of Perth Amboy, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5, while within 500 feet of the Douglas G. Dzema Gardens, a public housing facility operated and maintained by the Housing Authority of the City of Perth Amboy, contrary to the provisions of N.J.S.A. 2C:35-7.1, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

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

JESUS CRIADO

and

VERONICA MARTINEZ

on or about July 17, 2011, in the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Unlawful Possession of a Handgun - Second Degree)

JESUS CRIADO

and

VERONICA MARTINEZ

on or about July 17, 2011, in the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a handgun, that is, .380 caliber Jimenez Arms handgun, serial number 082693, 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-SEVEN

(Possession of Weapons during Commission
of Certain Crimes - Second Degree)

JESUS CRIADO

and

VERONICA MARTINEZ

on or about July 17, 2011, in the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a firearm, that is, .380 caliber Jimenez Arms handgun, serial number 082693, while in the course of committing a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1(a), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Uttering a Forged Instrument - Third degree)

ISIS RIVERA

between, on or about February 18, 2010 and April 20, 2011, at the City of Perth Amboy, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did utter to Check X-Change, writings, to wit: checks, knowing the same to be executed so that it purported to be the acts of Carol Rivera, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Unlawful Possession of Certain Electronic Devices in
Correctional Facilities - Third Degree)

ELIGIO BUENO

between on or about March 1, 2011, and between on or about August 10, 2011, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess an electronic communication device, that is, a wireless telephone, while confined in New Jersey State Prison, a State correctional facility, contrary to the provisions of N.J.S.A. 2C:29-10(b), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Unlawful Possession of Certain Electronic Devices in
Correctional Facilities - Third Degree)

WILLIAM SUAREZ

between on or about March 1, 2011, and between on or about August 10, 2011, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess an electronic communication device, that is, a wireless telephone, while confined in New Jersey State Prison, a State correctional facility, contrary to the provisions of N.J.S.A. 2C:29-10(b), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Certain Persons Not to Have Weapons - Second Degree)

JESUS CRIADO

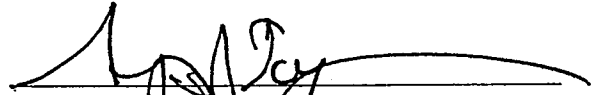
on or about July 17, 2011, in the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of aggravated assault in Essex County, on accusation number 03-06-0539A, did possess a firearm, that is, a .380 caliber Jimenez Arms handgun, serial number 082693, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Certain Persons Not to Have Weapons - Second Degree)

DAMIEN CASTRO

on or about August 4, 2011, in the Borough of Cartert, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of robbery in Middlesex County, on indictment number 03-04-478I, did possess a firearm, that is, a .40 caliber Glock pistol, serial number MAR453, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.


AAG Stephen J. Taylor
Director
Division of Criminal Justice

A TRUE BILL:


Foreperson

Date: 7-30-12

FILED

AUG 6 - 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ621-12-10

Superior Court

Docket Number 12 - 08 - 00146 - 8

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

DANNI RIVERA,)
AKA "DINOBLE")

ISIS RIVERA)
AKA "ICHY")

JESUS CRIADO)

WILLIAM SUAREZ)
AKA "PACHU")

ELIGIO BUENO)
AKA "JUNE")

ANDRE OCASIO)

DAMIEN CASTRO)

RICHARD ORENGO)

ROY REMEGGIO)

ANTONIO MARTINEZ)

HECTOR DELVALLE)

JONATHAN NIEVES)

ALEXANDER COSME)

JOSUE SANTIAGO)

WILLIE BROWN)

ALEXANDER ROSARIO)

DAVID RIVERA)

WILLIAM GONZALEZ)

JACQUELINE DEVARGAS)
CAROL RIVERA)
DEBRA CONROY)
MARIO FLORES)
DORA FIGUEROA)
MONA ALPHONSE)
CARMEN ZEPEDA)
ROSALEE HOWARD)
MARIA DEL CID)
ALBERTO MELENDEZ)
JUFRANIA BLANCA)
THOMAS STRUHMANN)
and)
VERONICA MARTINEZ)

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

IT IS ORDERED on this 6th day of August, 2012, pursuant to paragraph 8 of the State Grand Jury 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 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.

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