

**FILED**

**FEB 27 2020**

**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ744-20-12

Superior Court

Docket Number 20-02-00026-S

STATE OF NEW JERSEY )

v. )

WILBERT SEGARRA )

LUIS I. ROSADO )

MELIGZA CRUZ )

MARIA MORALES )

RAMON SALDANA )

RAFAEL VELAZQUEZ )

MIGDOEL MORALES-CRUZ )

MICHAEL CANALES )

ANGEL MARTINEZ )

DANIEL SANJURJO )

EMANUEL MORALES )

JOSEPH COOPER, JR. )

JESUS M. CRUZ )

and )

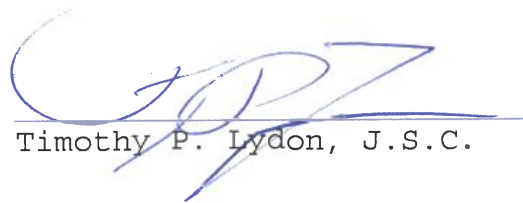
JOSE MORALES )

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 27 day of *July*, 2020, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Camden 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 Camden for filing.

  
Timothy P. Lydon, J.S.C.

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LAW DIVISION - CRIMINAL

**State Grand Jury Judge**

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Number SGJ744-20-12  
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Docket Number 20-02-00026-S

STATE OF NEW JERSEY )  
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 v. )  
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 WILBERT SEGARRA )  
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 MELIGZA CRUZ )  
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 )  
 ANGEL MARTINEZ )  
 )  
 DANIEL SANJURJO )  
 )  
 EMANUEL MORALES )  
 )  
 JOSEPH COOPER, JR. )  
 )  
 JESUS M. CRUZ )  
 )  
 and )  
 )  
 JOSE MORALES )

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

COUNT ONE

(Racketeering - First Degree)

WILBERT SEGARRA

LUIS I. ROSADO

MELIGZA CRUZ

MARIA MORALES

RAMON SALDANA

RAFAEL VELAZQUEZ

MIGDOEL MORALES-CRUZ

MICHAEL CANALES

ANGEL MARTINEZ

DANIEL SANJURJO

EMANUEL MORALES

and

JOSEPH COOPER, JR.

and other persons whose identities are known and unknown to the Grand Jurors, who are named as a 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 an enterprise engaged in or the activities of which affected trade or commerce, purposely or knowingly did conduct or participate directly or indirectly, or did conspire in the conduct of the enterprise's affairs through a pattern of racketeering

activity, including the commission of a crime of violence and/or a crime of the first degree and/or the use of firearms, in violation of N.J.S.A. 2C:41-2c and 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 January 29, 2019, and on or about October 4, 2019, 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

WILBERT SEGARRA, LUIS I. ROSADO, MELIGZA CRUZ, MARIA MORALES, RAMON SALDANA, RAFAEL VELAZQUEZ, MIGDOEL MORALES-CRUZ, MICHAEL CANALES, ANGEL MARTINEZ, DANIEL SANJURJO, EMANUEL MORALES, JOSEPH COOPER, JR., and other persons whose identities are known and unknown to the Grand Jurors, who are named as a co-conspirators and members 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, for the purposes set forth below.

#### THE PURPOSES OF THE ENTERPRISE

It was a part of the conspiracy that the purposes of the enterprise would include the following:

- A. Obtaining money and property for members and associates of the enterprise through violations of the laws of the

State of New Jersey, including the commission of the crimes of attempted murder; aggravated assault; possession of a weapon for an unlawful purpose; leader of a narcotics trafficking network; possession with intent to distribute and distribution of controlled dangerous substances;

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 or its leaders.

C. To conceal from law enforcement authorities the existence of the enterprise, the means and locations from which it conducts its affairs, including but not limited to using wireless telephones, a variety of locations, residences or motor vehicles for storage or delivery of controlled dangerous substances, which members and associates of the enterprise bought and sold.

#### 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 Attempted Murder (N.J.S.A. 2C:11-3); Aggravated Assault (N.J.S.A. 2C:12-1);

Possession of a Weapon for an Unlawful Purpose (N.J.S.A. 2C:39-4); Leader of a Narcotics Trafficking Network, (N.J.S.A. 2C:35-3); Possession with Intent to Distribute and Distribution of a Controlled Dangerous Substance (N.J.S.A. 35-5); Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property (N.J.S.A. 2C:35-7); and Conspiracy to commit these crimes, as described herein and in Counts Three, Four, Six, Seven, Nineteen, Twenty, Twenty-One, Twenty-Two, Twenty-Three, Twenty-Four, Twenty-Five, Twenty-Six, Twenty-Seven, Twenty-Eight, Twenty-Nine, Thirty, Thirty-One, Thirty-Two, Thirty-Three, Thirty-Four, Thirty-Five, Thirty-Six, Thirty-Seven, Thirty-Eight, Thirty-Nine, Forty, Forty-One, Forty-Two, Forty-Three, Forty-Four, Forty-Five, Forty-Six, Forty-Seven, Forty-Eight, and Forty-Nine of this Indictment.

WILBERT SEGARRA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Attempted Murder; Aggravated Assault; Possession of a Weapon for an Unlawful Purpose; and Leader of a Narcotics Trafficking Network; which racketeering conduct is the subject of Counts Two, Three, Four, Six, and Seven of this Indictment.

LUIS I. ROSADO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Possession with Intent to

Distribute a Controlled Dangerous Substance; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Forty-Three, Forty-Four, and Forty-Nine of this Indictment.

MELIGZA CRUZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Possession with Intent to Distribute a Controlled Dangerous Substance; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Twenty-One, Twenty-Two, Thirty-Nine, Forty, Forty-One, Forty-Two, Forty-Three, Forty-Four, Forty-Five, Forty-Six, Forty-Seven, Forty-Eight, and Forty-Nine of this Indictment.

MARIA MORALES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Thirty-One, Thirty-Two, Thirty-Three, Thirty-Four, Thirty-Five, and Thirty-Six of this Indictment.

RAMON SALDANA



did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Twenty-Three, Twenty-Four, Thirty-Seven, Thirty-Eight, Forty-Three, Forty-Four, Forty-Seven, and Forty-Eight of this Indictment.

RAFAEL VELAZQUEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Possession with Intent to Distribute a Controlled Dangerous Substance; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Twenty-Five, Twenty-Six, Thirty-Five, Thirty-Six, Forty-One, Forty-Two, and Forty-Nine of this Indictment.

MIGDOEL MORALES-CRUZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Thirty-Three, Thirty-Four, Thirty-Seven, and Thirty-Eight of this Indictment.

MICHAEL CANALES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Twenty-One, Twenty-Two, Twenty-Three, Twenty-Four, Twenty-Seven, and Twenty-Eight of this Indictment.

ANGEL MARTINEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Twenty-Seven, Twenty-Eight, Twenty-Nine, and Thirty of this Indictment.

DANIEL SANJURJO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Thirty-Nine, Forty, Forty-Five, and Forty-Six of this Indictment.

EMANUEL MORALES

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Conspiracy; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Thirty-Nine, Forty, Forty-One, and Forty-Two of this Indictment.

JOSEPH COOPER, JR.

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Attempted Murder; Aggravated Assault; Possession of a Weapon for an Unlawful Purpose; Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property; which racketeering conduct is the subject of Counts Two, Three, Four, Six, Nineteen, and Twenty 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)

WILBERT SEGARRA

LUIS I. ROSADO

MELIGZA CRUZ

MARIA MORALES

RAMON SALDANA

RAFAEL VELAZQUEZ

MIGDOEL MORALES-CRUZ

MICHAEL CANALES

ANGEL MARTINEZ

EMANUEL MORALES

DANIEL SANJURJO

and

JOSEPH COOPER, JR.

who are named as 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 January 3, 2019, and on or about October 4, 2019, 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 that:

A. One or more of them would engage in conduct which would

constitute the aforesaid crime, or

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

1. Knowingly or purposely 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) and N.J.S.A. 2C:35-5b(2);

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

(Attempted Murder - First Degree)

JOSEPH COOPER, JR.

and

WILBERT SEGARRA

on or about May 24, 2019, at the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, did purposely attempt to cause the death of S.R., by using a deadly weapon, that is, a firearm, and shooting S.R., contrary to the provisions of N.J.S.A. 2C:11-3, N.J.S.A. 2C:5-1, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Aggravated Assault - Second Degree)

JOSEPH COOPER, JR.

and

WILBERT SEGARRA

on or about May 24, 2019, at the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, did attempt to cause serious bodily injury to S.R., or caused such injury purposely or knowingly or under circumstances manifesting extreme indifference to the value of human life recklessly caused such injury, by using a deadly weapon, that is, a firearm, and shooting S.R., contrary to the provisions of N.J.S.A. 2C:12-1b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Unlawful Possession of a Weapon - Second Degree)

JOSEPH COOPER, JR.

and

WILBERT SEGARRA

on or about May 24, 2019, 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 handgun, 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 SIX

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

JOSEPH COOPER, JR.

and

WILBERT SEGARRA

on or about May 24, 2019, 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 firearm, with purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Leader of a Narcotics Trafficking Network - First Degree)

WILBERT SEGARRA

between on or about January 29, 2019, and on or about October 4, 2019, 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 engage for profit in a scheme or course of conduct to unlawfully manufacture, distribute, dispense, bring into or transport in this State, heroin, a Schedule I controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-3, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Promoting Organized Street Crime - First Degree)

WILBERT SEGARRA

LUIS I. ROSADO

and

MELIGZA CRUZ

between on or about January 29, 2019, and on or about October 4, 2019, 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 commit one or more of the crimes enumerated in N.J.S.A. 2C:33-30, specifically, Possession with Intent to Distribute and Distribution of Controlled Dangerous Substances, in violation of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(2), Attempted Murder, in violation of N.J.S.A. 2C:11-3; Aggravated Assault, in violation of N.J.S.A. 2C:12-1; and/or Possession of a Weapon for an Unlawful Purpose, in violation of N.J.S.A. 2C:39-4; 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 NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

JOSEPH COOPER, JR.

on or about January 29, 2019, 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, heroin, a Schedule I 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 TEN

(Possession of a Controlled Dangerous Substance - Third Degree)

MELIGZA CRUZ

between on or about February 21, 2019, and on or about October 4, 2019, 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, heroin, a Schedule I 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 ELEVEN

(Possession of a Controlled Dangerous Substance - Third Degree)

MICHAEL CANALES

between on or about February 21, 2019, and on or about May 1, 2019, 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, heroin, a Schedule I 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 TWELVE

(Possession of a Controlled Dangerous Substance - Third Degree)

RAMON SALDANA

between on or about March 19, 2019, and on or about September 21, 2019, 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, heroin, a Schedule I 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 THIRTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

RAFAEL VELAZQUEZ

between on or about April 12, 2019, and on or about October 4, 2019, 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, heroin, a Schedule I 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 FOURTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

ANGEL MARTINEZ

between on or about May 1, 2019, and on or about May 2, 2019, 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, heroin, a Schedule I 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 FIFTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

MARIA MORALES

between on or about May 20, 2019, and on or about August 5, 2019, 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, heroin, a Schedule I 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 SIXTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

MIGDOEL MORALES-CRUZ

between on or about May 31, 2019, and on or about August 5, 2019, 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, heroin, a Schedule I 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 SEVENTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

DANIEL SANJURJO

between on or about August 21, 2019, and on or about September 4, 2019, 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, heroin, a Schedule I 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 EIGHTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

LUIS I. ROSADO

on or about October 4, 2019, 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, heroin, a Schedule I 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 NINETEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

JOSEPH COOPER, JR.

on or about January 29, 2019, at the City of Camden, in the County of Camden, 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

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

JOSEPH COOPER, JR.

on or about January 29, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District 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-ONE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MICHAEL CANALES

and

MELIGZA CRUZ

on or about February 21, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT TWENTY-TWO

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

MICHAEL CANALES

and

MELIGZA CRUZ

on or about February 21, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MICHAEL CANALES

and

RAMON SALDANA

between on or about March 19, 2019, and on or about April 15, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

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

MICHAEL CANALES

and

RAMON SALDANA

between on or about March 19, 2019, and on or about April 15, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

RAFAEL VELAZQUEZ

on or about April 12, 2019, at the City of Camden, in the County of Camden, 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-SIX

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

RAFAEL VELAZQUEZ

on or about April 12, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District 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-SEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

MICHAEL CANALES

and

ANGEL MARTINEZ

on or about May 1, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

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

MICHAEL CANALES

and

ANGEL MARTINEZ

on or about May 1, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Distribution of a Controlled Dangerous Substance - Third Degree)

ANGEL MARTINEZ

on or about May 2, 2019, at the City of Camden, in the County of Camden, 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 THIRTY

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

ANGEL MARTINEZ

on or about May 2, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District 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 THIRTY-ONE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MARIA MORALES

between on or about May 20, 2019, and on or about July 24, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

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

MARIA MORALES

between on or about May 20, 2019, and on or about July 24, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MARIA MORALES

and

MIGDOEL MORALES-CRUZ

between on or about May 31, 2019, and on or about August 5, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

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

MARIA MORALES

and

MIGDOEL MORALES-CRUZ

between on or about May 31, 2019, and on or about August 5, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MARIA MORALES

and

RAFAEL VELAZQUEZ

between on or about June 19, 2019, and on or about June 28, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

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

MARIA MORALES

and

RAFAEL VELAZQUEZ

between on or about June 19, 2019, and on or about June 28, 2019, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, 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 - Third Degree)

MIGDOEL MORALES-CRUZ

and

RAMON SALDANA

on or about July 18, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT THIRTY-EIGHT

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

MIGDOEL MORALES-CRUZ

and

RAMON SALDANA

on or about July 18, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MELIGZA CRUZ

DANIEL SANJURJO

and

EMANUEL MORALES

on or about August 21, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

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

MELIGZA CRUZ

DANIEL SANJURJO

and

EMANUEL MORALES

on or about August 21, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-ONE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MELIGZA CRUZ

EMANUEL MORALES

and

RAFAEL VELAZQUEZ

on or about August 27, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

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

MELIGZA CRUZ

EMANUEL MORALES

and

RAFAEL VELAZQUEZ

on or about August 27, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-THREE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MELIGZA CRUZ

LUIS I. ROSADO

and

RAMON SALDANA

on or about August 28, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FOUR

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

MELIGZA CRUZ

LUIS I. ROSADO

and

RAMON SALDANA

on or about August 28, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

MELIGZA CRUZ

and

DANIEL SANJURJO

on or about September 4, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT FORTY-SIX

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

MELIGZA CRUZ

and

DANIEL SANJURJO

on or about September 4, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

MELIGZA CRUZ

and

RAMON SALDANA

between on or about September 10, 2019, and on or about September 12, 2019, at the City of Camden, in the County of Camden, 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), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-EIGHT

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

MELIGZA CRUZ

and

RAMON SALDANA

between on or about September 10, 2019, and on or about September 12, 2019, at the City of Camden, in the County of Camden, 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:35-5a, while within 1,000 feet of Cooper's Poynt Family School, which is owned by or leased to the Camden City School District and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-NINE

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

LUIS I. ROSADO

MELIGZA CRUZ

and

RAFAEL VELAZQUEZ

on or about October 4, 2019, at the City of Camden, in the County of Camden, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY

(Unlawful Possession of a Weapon - Second Degree)

JESUS M. CRUZ

and

JOSE MORALES

on or about May 8, 2019, 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 with a defaced 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:39-5(b), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-ONE

(Possession of a Defaced Firearm - Fourth Degree)

JESUS M. CRUZ

and

JOSE MORALES

on or about May 8, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession a prohibited weapon, that is, a Taurus 9mm handgun with a defaced serial number, contrary to the provisions of N.J.S.A. 2C:39-3d, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-TWO

(Endangering the Welfare of a Child - Second Degree)

MELIGZA CRUZ

between on or about August 21, 2019, and on or about September 12, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having a legal duty for the care of A.C., born August 27, 2018, knowingly did cause harm to A.C., making A.C. an abused or neglected child as defined in R.S. 9:6-1, R.S. 9:6-3 and P.L. 1974, c.119, s.1, (C. 9:6-8:21), contrary to the provisions of N.J.S.A. 2C:24-4a(2), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-THREE

(Endangering the Welfare of a Child - Third Degree)

EMANUEL MORALES

and

DANIEL SANJURJO

between on or about August 21, 2019, and on or about September 12, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did cause harm to A.C., born August 27, 2018, making A.C. an abused or neglected child as defined in R.S. 9:6-1, R.S. 9:6-3 and P.L. 1974, c.119, s.1, (C. 9:6-8:21), contrary to the provisions of N.J.S.A. 2C:24-4a(2), and against the peace of this State, the government and dignity of the same.



COUNT FIFTY-FOUR

(Endangering the Welfare of a Child - Third Degree)

RAMON SALDANA

on or about September 12, 2019, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did cause harm to A.C., born August 27, 2018, making A.C. an abused or neglected child as defined in R.S. 9:6-1, R.S. 9:6-3 and P.L. 1974, c.119, s.1, (C. 9:6-8:21), contrary to the provisions of N.J.S.A. 2C:24-4a(2), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FIVE

(Certain Persons Not to Have Weapons - Second Degree)

JOSE MORALES

on or about May 8, 2019, 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 with Intent to Distribute a Controlled Dangerous Substance in Camden County, on Accusation Number CAM150401252A, and/or Third Degree Possession with Intent to Distribute on or Near School Property in Camden County, on Indictment Number CAM150401241I, and/or Third Degree Possession with Intent to Distribute on or Near School Property in Camden County, on Indictment Number CAM090501845I, and/or Third Degree Possession with Intent to Distribute on or Near School Property in Camden County, on Indictment Number CAM040401354I, and/or Third Degree Aggravated Assault on a Law Enforcement Officer in Camden County, Indictment CAM001003323I, and/or Possession with Intent to Distribute on or Near School Property in Camden County, on Indictment Number CAM960601844I, did own, possess, or control the following firearm: a Taurus 9mm handgun with a defaced serial number, 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.

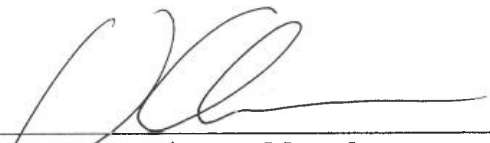
COUNT FIFTY-SIX

(Certain Persons Not to Have Weapons - Second Degree)

WILBERT SEGARRA

on or about May 24, 2019, 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 Distribution on or Near School Property in Camden County, on Indictment Number CAM100902532I, and/or Third Degree Aggravated Assault in Camden County, on Indictment Number CAM100300906I, and/or Third Degree Escape in Camden County, on Indictment Number CAM070200645I, and/or Third Degree Distribution on or Near School Property in Camden County, on Accusation Number CAM010100076A, and/or Third Degree Distribution on or Near School Property in Camden County, on Indictment Number CAM000802547I, and/or Third Degree Distribution on or Near School Property in Camden County, on Indictment Number CAM000702385I, did own, possess, or control a handgun, 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 Veronica Allende  
Director  
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 2/27/2020