

SEPTEMBER 22, 2021

September 14, 2021

State Grand Jury Judge

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL
State Grand Jury
Number SGJ759-21-7
Superior Court
Docket Number 21-9-129-S

STATE OF NEW JERSEY)
)
 v.)
 FRANK BLAKE)
)
 EDUARDO LAGO)
)
 ROBERTO GARCIA)
)
 WILLIAM FIGUEROA)
)
 ALEXANDER CHLUDZINSKI)
)
 KEVIN WASHINGTON)
)
 ANDY REYES)
)
 JAMES ZARATE)
)
 LARRY CARDONA)
)
 MAURICE DIAZ YOUNG)
)
 AND)
)
 JUAN COLON)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

FRANK BLAKE

EDUARDO LAGO

ROBERTO GARCIA

WILLIAM FIGUEROA

ALEXANDER CHLUDZINSKI

KEVIN WASHINGTON

ANDY REYES

JAMES ZARATE

LARRY CARDONA

MAURICE DIAZ YOUNG

AND

JUAN COLON

who are named as defendants herein, and other persons whose identities are unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about October 18, 2019, and on or about July 30, 2021, at 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 Aggravated Assault, Solicitation, Recruitment to Join a Criminal Street Gang, Possession of Weapons for Unlawful Purposes, Unlawful Possession of Weapons, Electronic Communications Devices in Correctional Facilities, Possession with Intent to Distribute a Controlled Dangerous Substance, Distribution or Possession With Intent to Distribute a Controlled Dangerous Substance within 1000 Feet of

School Property, Unlawful Possession of a High Capacity Magazine, Obstructing Administration of Law or Other Governmental Function, Hindering Prosecution, Terroristic Threats, Obtaining or Possessing Synthetic Cannabinoid, or Tampering with Public Records or Information, 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. Aggravated Assault, in that one or more of them purposely would attempt to cause serious bodily injury to Victim #1, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b(1);

2. Aggravated Assault, in that one or more of them purposely would attempt to cause serious bodily injury to Victim #2, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b(1)

3. Aggravated Assault, in that one or more of them purposely would attempt to cause serious bodily injury to Victim #3, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b(1);

4. Aggravated Assault, in that one or more of them purposely would attempt to cause serious bodily injury to Victim #4, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b(1);

5. Aggravated Assault, in that one or more of them purposely would attempt to cause serious bodily injury to Victim #5, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b(1);

6. Aggravated Assault, in that one or more of them purposely would attempt to cause serious bodily injury to Victim #6, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b(1);

7. Solicitation, Recruitment to Join Criminal Street Gang, in that one or more of them, while under official detention, would solicit or recruit another, that is, Recruit #1, an individual whose identity is known to the grand jury, to join or actively participate in a criminal street gang, to wit: the Almighty Latin King & Queen Nation, with the knowledge or purpose that the said Recruit #1 would promote, further, assist, plan, aid, agree, or attempt to aid in the commission of criminal conduct by a

member of the criminal street gang, contrary to the provisions of N.J.S.A. 2C:33-28a and N.J.S.A. 2C:33-28e;

8. Possession of Weapons for Unlawful Purposes, in that one or more of them would possess a certain weapon, that is, one or more prison shanks, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4d;

9. Unlawful Possession of Weapons, in that one or more of them would possess a certain weapon, that is one or more prison shanks, under circumstances not manifestly appropriate for lawful use, contrary to the provisions of N.J.S.A. 2C:39-5d;

10. Electronic Communications Devices in Correctional Facilities, in that one or more of them would possess or use one or more electronic communication devices or one or more devices to recharge an electronic communication device while confined in a State Correctional Facility, contrary to the provisions of N.J.S.A. 2C:29-10b;

11. Possession with Intent to Distribute a Controlled Dangerous Substance, Methamphetamine, in that one or more of them would knowingly or purposely possess or have under their control, with the intent to distribute or dispense, methamphetamine, or its analog, 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(8);

12. Distribution or Possession With Intent to Distribute a Controlled Dangerous Substance within 1000 Feet of School Property, in that one or more of them would knowingly or purposely distribute or possess with intent to distribute a controlled dangerous substance, that is, Methamphetamine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the George Washington Elementary School, which is owned by or leased to the Hillside Board Of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7;

13. Unlawful Possession of a High Capacity Magazine, in that one or more of them would knowingly possess a large capacity ammunition magazine, that is an ammunition magazine capable of carrying more than ten bullets, without proper registration of a permitted firearm, contrary to the provisions of N.J.S.A. 2C:39-3j;

14. Obstructing Administration of Law or Other Governmental Function, in that one or more of them purposely would prevent or attempt to prevent law enforcement officials generally and Law Enforcement Officer #1, an individual whose identity is known to the grand jury, specifically, who are public servants, from lawfully

performing an official function by means of intimidation, force, violence or physical interference or obstacle, or by means of any independently unlawful act, that is threaten to go to the homes of investigating law enforcement officials generally and Law Enforcement Officer #1 specifically, or did discuss Almighty Latin King and Queen members assaulting investigating law enforcement officers within the prison system, thereby obstructing the detection or investigation of a crime or the prosecution of one or more persons for a crime, contrary to the provisions of N.J.S.A. 2C:29-1b;

15. Hindering Apprehension or Prosecution, in that one or more of them with purpose to hinder the apprehension, prosecution, conviction or punishment of one or more other persons, who are known to the grand jury, for an offense, would prevent or obstruct, by means of force or intimidation, anyone from performing an act which might aid in the discovery or apprehension of the said other persons or in the lodging of a charge the said other persons, that is, during the course of a law enforcement investigation one or more of them did threaten to go to the homes of investigating law enforcement officers, or did discuss Almighty Latin King and Queen members assaulting

investigating law enforcement officers within the prison system, contrary to the provisions of N.J.S.A. 2C:29-3;

16. Terroristic Threats, in that one or more of them, with the purpose to terrorize another or in reckless disregard of the risk of causing such terror, would threaten to commit any crime of violence, that is, to go to the homes of one or more law enforcement officers generally and Law Enforcement Officer #1, an individual whose identity is known to the grand jury, specifically in order to commit violence, contrary to the provisions of N.J.S.A. 2C:12-3a;

17. Obtaining, possessing synthetic cannabinoid, in that one or more of them would possess a synthetic cannabinoid or a synthetic cannabinoid analogue, that is MDMB-4en-PINACA, a synthetic cannabinoid analogue, or Fluoro-ADB, a Schedule I CDS, contrary to the provisions of N.J.S.A. 2C:35-5.3c; or

18. Tampering with Public Records or Information, in that one or more of them, with purpose to defraud or injure, would make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, by providing false information in an

New Jersey Department of Corrections Inmate Telephone
Assignment Form, contrary to the provisions of N.J.S.A.
2C:28-7;

OVERT ACTS

In furtherance of the conspiracy and to achieve its
purposes, the aforesaid conspirators committed the
following OVERT ACTS, among others:

1. Between on or about September 10, 2020 and on or about
April 21, 2021, BLAKE, LAGO, GARCIA, FIGUEROA, REYES, and
DIAZ YOUNG planned or carried out an attack on Victim #1 in
the prison yard of New Jersey State Prison by repeatedly
punching and kicking Victim #1, resulting in injuries
including respiratory failure and traumatic brain injury.
2. Between on or about December 1, 2020 and on or about
April 21, 2021, BLAKE, WASHINGTON, CHLUDZINSKI, CARDONA,
REYES, and ZARATE planned an attack on Victim #2, an
individual whose identity is known to the grand jury.
3. On or about October 18, 2019, CHLUDZINSKI attacked
Victim #3, an individual whose identity is known to the
grand jury, in a shower facility at New Jersey State Prison
with an improvised weapon, causing multiple puncture
wounds.

4. Between on or about April 5, 2020 and on or about April 6, 2020, REYES, GARCIA, and Individual #1, an individual whose identity is known to the Grand Jurors, who is named as a coconspirator but not as a defendant herein, planned that GARCIA would carry out an attack on Victim #4, an individual whose identity is known to the grand jury, in exchange for Individual #1, a member of a different street gang, carrying out an attack on Victim #5, an individual whose identity is known to the grand jury.

5. On or about April 5, 2020, Individual #1, an individual whose identity is known to the Grand Jurors, who is named as a coconspirator but not as a defendant herein, carried out an attack on Victim #5, an individual whose identity is known to the grand jury, in the prison yard at New Jersey State Prison by repeatedly punching and kicking Victim #5 in the head or elsewhere, resulting in Victim #5's hospitalization and treatment for head trauma.

6. On or about April 6, 2020, GARCIA carried out an attack on Victim #4, an individual whose identity is known to the grand jury, in the prison yard at New Jersey State Prison by repeatedly punching and kicking Victim #4 in the head or elsewhere, resulting in bodily injury.

7. Between on or about April 16, 2021 and on or about April 21, 2021, ZARATE and CARDONA planned or carried out

an attack in the prison yard at New Jersey State Prison by repeatedly punching and kicking Victim #6 in the head or elsewhere, resulting in Victim #6's loss of consciousness. All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Promoting Organized Street Crime - First Degree)

FRANK BLAKE

between on or about October 18, 2019, and on or about July 21, 2021, at the city of Trenton, in the County of Mercer, in the Township of Hillside, in the County of Union, in the City of Newark, in the County of Essex, 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, Aggravated Assault, N.J.S.A. 2C:12-1b1, and Attempted Aggravated Assault, N.J.S.A. 2C:12-1b1 and N.J.S.A. 2C:5-1, that is, the said FRANK BLAKE did supervise other members of the Almighty Latin King & Queen Nation as they did commit one or more aggravated assaults within the New Jersey prison system, contrary to the provisions of N.J.S.A. 2C:33-30, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Aggravated Assault - Second Degree)

FRANK BLAKE

EDUARDO LAGO

ROBERTO GARCIA

WILLIAM FIGUEROA

ANDY REYES

AND

MAURICE DIAZ YOUNG

between on or about September 10, 2020 and on or about April 21, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did cause serious bodily injury to another, or under circumstances manifesting extreme indifference to the value of human life, recklessly did cause serious bodily injury to another, that is, the aforementioned individuals did, either as principals or as accomplices, plan and carry out an attack upon Victim #1 in the prison yard at New Jersey State Prison by repeatedly punching and kicking Victim #1 in the head or elsewhere, resulting in injuries including respiratory failure and traumatic brain injury, contrary to the provisions of N.J.S.A. 2C:12-1b1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT FOUR

(Attempted Aggravated Assault - Second Degree)

FRANK BLAKE

KEVIN WASHINGTON

ALEXANDER CHLUDZINSKI

LARRY CARDONA

ANDY REYES

AND

JAMES ZARATE

between on or about December 1, 2020 and on or about April 21, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to another, or under circumstances manifesting extreme indifference to the value of human life, recklessly did cause serious bodily injury to another, that is, the aforementioned individuals did plan or attempt to cause serious bodily injury to Victim #2, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b1, N.J.S.A. 2C:5-1, and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT FIVE

(Aggravated Assault - Third Degree)

ALEXANDER CHLUDZINSKI

on or about October 18, 2019, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause or purposely or knowingly did cause bodily injury to another with a deadly weapon, that is, the said ALEXANDER CHLUDZINSKI purposely did attempt to cause or purposely or knowingly did cause Victim #3, an individual whose identity is known to the grand jury, bodily injury, including multiple puncture wounds, by stabbing Victim #3 with an improvised weapon in a shower facility at New Jersey State Prison, contrary to the provisions of N.J.S.A. 2C:12-1b2, and against the peace of this State, the government, and dignity of the same.

COUNT SIX

(Attempted Aggravated Assault - Second Degree)

ANDY REYES

AND

ROBERTO GARCIA

and another person, Individual #1, an individual whose identity is known to the Grand Jurors, who is named as a coconspirator but not as a defendant herein, on or about April 6, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to another, or under circumstances manifesting extreme indifference to the value of human life, recklessly did cause serious bodily injury to another, that is, the aforementioned individuals did attempt to cause serious bodily injury to Victim #4, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b1, N.J.S.A. 2C:5-1, and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT SEVEN

(Aggravated Assault - Third Degree)

ANDY REYES

AND

ROBERTO GARCIA

and another person, Individual #1, an individual whose identity is known to the Grand Jurors, who is named as a coconspirator but not as a defendant herein, on or about April 6, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did cause significant bodily injury to another, or under circumstances manifesting extreme indifference to the value of human life, recklessly did cause significant bodily injury to another, that is, the aforementioned individuals did, either as principals or as accomplices, plan, promote, or carry out an attack upon Victim #4, an individual whose identity is known to the grand jury, in the prison yard at New Jersey State Prison by repeatedly punching and kicking Victim #4 in the head or elsewhere, contrary to the provisions of N.J.S.A. 2C:12-1b7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT EIGHT

(Attempted Aggravated Assault - Second Degree)

ANDY REYES

AND

ROBERTO GARCIA

and another person, Individual #1, an individual whose identity is known to the Grand Jurors, who is named as a coconspirator but not as a defendant herein, on or about April 5, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to another, or under circumstances manifesting extreme indifference to the value of human life, recklessly did cause serious bodily injury to another, that is, the aforementioned individuals did attempt to cause serious bodily injury to Victim #5, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b1, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT NINE

(Aggravated Assault - Third Degree)

ANDY REYES

AND

ROBERTO GARCIA

and another person, Individual #1, an individual whose identity is known to the Grand Jurors, who is named as a coconspirator but not as a defendant herein, on or about April 5, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did cause significant bodily injury to another, or under circumstances manifesting extreme indifference to the value of human life, recklessly did cause significant bodily injury to another, that is, the aforementioned individuals, either as principals or as accomplices, did plan, promote, or carry out an attack upon Victim #5, an individual whose identity is known to the grand jury, in the prison yard at New Jersey State Prison by repeatedly punching and kicking Victim #5 in the head or elsewhere, contrary to the provisions of N.J.S.A. 2C:12-1b7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT TEN

(Attempted Aggravated Assault - Second Degree)

JAMES ZARATE

AND

LARRY CARDONA

between on or about April 16, 2021 and on or about April 21, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to another, or under circumstances manifesting extreme indifference to the value of human life, recklessly did cause serious bodily injury to another, that is, the aforementioned individuals did attempt to cause serious bodily injury to Victim #6, an individual whose identity is known to the grand jury, contrary to the provisions of N.J.S.A. 2C:12-1b1, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT ELEVEN

(Aggravated Assault - Third Degree)

JAMES ZARATE

AND

LARRY CARDONA

between on or about April 16, 2021 and on or about April 21, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did cause significant bodily injury to another, or under circumstances manifesting extreme indifference to the value of human life, recklessly did cause significant bodily injury to another, that is, the aforementioned individuals did attack Victim #6, an individual whose identity is known to the grand jury, in the prison yard at New Jersey State Prison by repeatedly punching and kicking Victim #6 in the head or elsewhere, contrary to the provisions of N.J.S.A. 2C:12-1b7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT TWELVE

(Solicitation, Recruitment to Join Criminal Street Gang - Second Degree)

MAURICE DIAZ YOUNG

AND

JUAN COLON

between on or about November 11, 2020 and on or about December 2, 2020 in the City of Trenton, in the County of Mercer, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did solicit or recruit another to join or actively participate in a criminal street gang, while under official detention, with the knowledge or purpose that the person who is solicited or recruited would promote, further, assist, plan, aid, agree, or attempt to aid in the commission of criminal conduct by a member of a criminal street gang, that is, the said MAURICE DIAZ YOUNG, being on supervision of probation or parole, and JUAN COLON, being incarcerated at a facility for custody of persons under charge or conviction of an offense, did recruit Recruit #1, an individual whose identity is known to the grand jury, to join the Almighty Latin King & Queen Nation ("ALKQN"), with the knowledge or purpose that Recruit #1 would promote, further, assist, plan, aid, agree, or attempt to aid in the commission of criminal conduct by members of the ALKQN, contrary to the

provisions of N.J.S.A. 2C:33-28, and against the peace of this State, the government, and dignity of the same.

COUNT THIRTEEN

(Possession of a Firearm During the Commission of Certain Crimes
- Second Degree)

FRANK BLAKE

on or about April 22, 2021, in the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is a .357 Magnum caliber Ruger revolver, serial number 154-52137, a .45 auto caliber Springfield Armory semiautomatic pistol, serial number HE111585, or a 9mm Luger SCCY semiautomatic pistol, serial number C004218, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1a, and against the peace of this State, the government and the dignity of the same.

COUNT FOURTEEN

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

FRANK BLAKE

on or about April 22, 2021, in the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess or have under his control with intent to distribute or dispense a controlled dangerous substance, that is, Methamphetamine or its analog, in a quantity of five ounces or more, to wit: approximately 240.124 grams or 8.47 ounces, 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(8), and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

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

FRANK BLAKE

on or about April 22, 2021, in the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, Methamphetamine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the George Washington Elementary School which is owned by or leased to the Hillside Board Of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Unlawful Possession of a High Capacity Magazine - Fourth Degree)

FRANK BLAKE

on or about April 22, 2021, in the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, that is an ammunition magazine capable of carrying more than ten bullets, without proper registration of a permitted firearm, contrary to the provisions of N.J.S.A. 2C:39-3j, and against the peace of this State, the government and the dignity of the same.

COUNT SEVENTEEN

(Terroristic Threats - Third Degree)

FRANK BLAKE

AND

ALEXANDER CHLUDZINSKI

between on or about November 19, 2020 and on or about December 22, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose to terrorize another or in reckless disregard of the risk of causing such terror, did threaten to commit any crime of violence, that is, the said FRANK BLAKE and ALEXANDER CHLUDZINSKI did threaten to go to the homes of one or more law enforcement officers generally and Law Enforcement Officer #1, an individual whose identity is known to the grand jury, specifically in order to commit violence against them or their families, or did discuss Almighty Latin King and Queen members assaulting investigating law enforcement officers within the prison system while communicating on a jail phone call line known to be monitored by law enforcement, contrary to the provisions of N.J.S.A. 2C:12-3a, and against the peace of this State, the government and the dignity of the same.

COUNT EIGHTEEN

(Hindering Apprehension or Prosecution - Second Degree)

FRANK BLAKE

AND

ALEXANDER CHLUDZINSKI

between on or about November 19, 2020 and on or about December 22, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to hinder the apprehension, prosecution, conviction or punishment of one or more other persons, who are known to the grand jury, for an offense, did prevent or obstruct, by means of force or intimidation, anyone from performing an act which might aid in the discovery or apprehension of the said other persons or in the lodging of a charge the said other persons, that is, during the course of a law enforcement investigation, the said FRANK BLAKE and ALEXANDER CHLUDZINSKI did threaten to go to the homes of investigating law enforcement officers, or did discuss Almighty Latin King and Queen members assaulting investigating law enforcement officers within the prison system while communicating on a jail phone call line known to be monitored by law enforcement, with the purpose to hinder the apprehension, prosecution, conviction or punishment of members of the Almighty Latin King & Queen Nation for one or more offenses, contrary to

the provisions of N.J.S.A. 2C:29-3, and against the peace of this State, the government and the dignity of the same.

COUNT NINETEEN

(Obstructing Administration of Law or Other Governmental
Function - Fourth Degree)

FRANK BLAKE

AND

ALEXANDER CHLUDZINSKI

between on or about November 19, 2020 and on or about December 22, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did prevent or attempt to prevent law enforcement officials generally and Law Enforcement Officer #1, an individual whose identity is known to the grand jury, specifically, who are public servants, from lawfully performing an official function by means of intimidation, force, violence or physical interference or obstacle, or by means of any independently unlawful act, that is: threaten to go to the homes of investigating law enforcement officials generally and Law Enforcement Officer #1 specifically, or did discuss Almighty Latin King and Queen members assaulting investigating law enforcement officers within the prison system, thereby obstructing the detection or investigation of a crime or the prosecution of one or more persons for a crime, contrary to the provisions of N.J.S.A. 2C:29-1b and N.J.S.A. 2C:2-6, and against

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

COUNT TWENTY

(Possession of Weapons for Unlawful Purposes - Third Degree)

ALEXANDER CHLUDZINSKI

on or about October 18, 2019, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is a shank, with a purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4(d), and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY-ONE

(Possession of Weapons for Unlawful Purposes - Third Degree)

LARRY CARDONA

on or about November 5, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is a shank, with a purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4(d), and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY-TWO

(Possession of Weapons for Unlawful Purposes - Third Degree)

ALEXANDER CHLUDZINSKI

on or about November 19, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is a shank, with a purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4(d), and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY-THREE

(Possession of Weapons for Unlawful Purposes - Third Degree)

ANDY REYES

and

JAMES ZARATE

on or about January 11, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is a shank, with a purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4(d), and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY-FOUR

(Possession of Weapons for Unlawful Purposes - Third Degree)

ANDY REYES

and

JAMES ZARATE

on or about January 11, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is a shank, with a purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4(d), and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY-FIVE

(Possession of Weapons for Unlawful Purposes - Third Degree)

ANDY REYES

and

JAMES ZARATE

on or about January 11, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is a shank, with a purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4(d), and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY-SIX

(Possession of Weapons for Unlawful Purposes - Third Degree)

ANDY REYES

and

JAMES ZARATE

on or about January 11, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is a shank, with a purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4(d), and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY-SEVEN

(Possession of Weapons for Unlawful Purposes - Third Degree)

ROBERTO GARCIA

on or about June 15, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is a modified safety razor, with a purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4(d), and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY-EIGHT

(Unlawful Possession of Weapons - Fourth Degree)

ALEXANDER CHLUDZINSKI

on or about October 18, 2019, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon under circumstances not manifestly appropriate for such lawful uses as it may have, that is, the said ALEXANDER CHLUDZINSKI did possess a shank while incarcerated, contrary to the provisions of N.J.S.A. 2C:39-5(d), and against the peace of this State, the government, and dignity of the same.

COUNT TWENTY-NINE

(Unlawful Possession of Weapons - Fourth Degree)

LARRY CARDONA

on or about November 5, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon under circumstances not manifestly appropriate for such lawful uses as it may have, that is, the said LARRY CARDONA did possess a shank while incarcerated, contrary to the provisions of N.J.S.A. 2C:39-5(d), and against the peace of this State, the government, and dignity of the same.

COUNT THIRTY

(Unlawful Possession of Weapons - Fourth Degree)

ALEXANDER CHLUDZINSKI

on or about November 19, 2020, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon under circumstances not manifestly appropriate for such lawful uses as it may have, that is, the said ALEXANDER CHLUDZINSKI did possess a shank while incarcerated, contrary to the provisions of N.J.S.A. 2C:39-5(d), and against the peace of this State, the government, and dignity of the same.

COUNT THIRTY-ONE

(Unlawful Possession of Weapons - Fourth Degree)

ANDY REYES

And

JAMES ZARATE

on or about January 11, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon under circumstances not manifestly appropriate for such lawful uses as it may have, that is, the said ANDY REYES and JAMES ZARATE did possess a shank while incarcerated, contrary to the provisions of N.J.S.A. 2C:39-5(d), and against the peace of this State, the government, and dignity of the same.

COUNT THIRTY-TWO

(Unlawful Possession of Weapons - Fourth Degree)

ANDY REYES

And

JAMES ZARATE

on or about January 11, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon under circumstances not manifestly appropriate for such lawful uses as it may have, that is, the said ANDY REYES and JAMES ZARATE did possess a shank while incarcerated, contrary to the provisions of N.J.S.A. 2C:39-5(d), and against the peace of this State, the government, and dignity of the same.

COUNT THIRTY-THREE

(Unlawful Possession of Weapons - Fourth Degree)

ANDY REYES

And

JAMES ZARATE

on or about January 11, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon under circumstances not manifestly appropriate for such lawful uses as it may have, that is, the said ANDY REYES and JAMES ZARATE did possess a shank while incarcerated, contrary to the provisions of N.J.S.A. 2C:39-5(d), and against the peace of this State, the government, and dignity of the same.

COUNT THIRTY-FOUR

(Unlawful Possession of Weapons - Fourth Degree)

ANDY REYES

And

JAMES ZARATE

on or about January 11, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon under circumstances not manifestly appropriate for such lawful uses as it may have, that is, the said ANDY REYES and JAMES ZARATE did possess a shank while incarcerated, contrary to the provisions of N.J.S.A. 2C:39-5(d), and against the peace of this State, the government, and dignity of the same.

COUNT THIRTY-FIVE

(Unlawful Possession of Weapons - Fourth Degree)

ROBERTO GARCIA

on or about January 11, 2021, in the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon under circumstances not manifestly appropriate for such lawful uses as it may have, that is, the said ROBERTO GARCIA did possess a modified safety razor while incarcerated, contrary to the provisions of N.J.S.A. 2C:39-5(d), and against the peace of this State, the government, and dignity of the same.

COUNT THIRTY-SIX

(Electronic Communications Devices in Correctional Facilities -
Third Degree)

LARRY CARDONA

on or about November 5, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess or use an electronic communication device, that is, a wireless telephone, while confined in a State Correctional Facility, that is, the New Jersey State Prison, 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-SEVEN

(Electronic Communications Devices in Correctional Facilities -
Third Degree)

LARRY CARDONA

on or about November 5, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess or use an electronic communication device or device to recharge an electronic communication device, that is, a wireless telephone charging device, while confined in a State Correctional Facility, that is, the New Jersey State Prison, 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-EIGHT

(Possessing Synthetic Cannabinoid -Fourth Degree)

LARRY CARDONA

on or about November 5, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a quantity of less than one ounce of MDMB-4en-PINACA, a synthetic cannabinoid analogue, or Fluoro-ADB, a Schedule I CDS, contrary to the provisions of N.J.S.A. 2C:35-5.3c, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Tampering with Public Records or Information - Third Degree)

LARRY CARDONA

on or about May 17, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in, or false alteration of any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said LARRY CARDONA did provide false information in an NJDOC Inmate Telephone Assignment Form, a form kept by the government, contrary to the provisions of N.J.S.A. 2C:28-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Tampering with Public Records or Information - Third Degree)

LARRY CARDONA

on or about March 3, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said LARRY CARDONA did provide false information in an NJDOC Inmate Telephone Assignment Form, a form kept by the government, contrary to the provisions of N.J.S.A. 2C:28-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-ONE

(Tampering with Public Records or Information - Third Degree)

LARRY CARDONA

on or about August 24, 2020, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said LARRY CARDONA did provide false information in an NJDOC Inmate Telephone Assignment Form dated August 24, 2020, a form kept by the government, contrary to the provisions of N.J.S.A. 2C:28-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

(Tampering with Public Records or Information - Third Degree)

JUAN COLON

on or about January 19, 2020, at the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said JUAN COLON did provide false information in an NJDOC Inmate Telephone Assignment Form dated January 19, 2020, a form kept by the government, contrary to the provisions of N.J.S.A. 2C:28-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-THREE

(Tampering with Public Records or Information - Third Degree)

JUAN COLON

on or about April 18, 2020, at the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said JUAN COLON did provide false information in an NJDOC Inmate Telephone Assignment Form dated April 18, 2020, a form kept by the government, contrary to the provisions of N.J.S.A. 2C:28-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FOUR

(Tampering with Public Records or Information - Third Degree)

JUAN COLON

on or about July 15, 2020, at the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said JUAN COLON did provide false information in an NJDOC Inmate Telephone Assignment Form dated July 15, 2020, a form kept by the government, contrary to the provisions of N.J.S.A. 2C:28-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-FIVE

(Tampering with Public Records or Information - Third Degree)

JUAN COLON

on or about October 15, 2020, at the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said JUAN COLON did provide false information in an NJDOC Inmate Telephone Assignment Form dated October 15, 2020, a form kept by the government, contrary to the provisions of N.J.S.A. 2C:28-7, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SIX

(Gang Criminality - First Degree)

FRANK BLAKE

MAURICE DIAZ YOUNG

EDUARDO LAGO

ROBERTO GARCIA

ALEXANDER CHLUDZINSKI

KEVIN WASHINGTON

ANDY REYES

JAMES ZARATE

AND

LARRY CARDONA

between on or about September 1, 2020 and on or about July 30, 2021, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while knowingly involved in criminal street gang activity dating between September 1, 2020, and October 18, 2019, and earlier, did commit, attempt to commit, or conspire to commit, as a principal or as an accomplice, one or more violations of N.J.S.A. 2C:12-1, N.J.S.A. 2C:12-3a, N.J.S.A. 2C:35-5a1, N.J.S.A. 2C:35-5b8, N.J.S.A. 2C:35-7, N.J.S.A. 2C:39-4, or N.J.S.A. 2C:39-5, contrary to the provisions of N.J.S.A. 2C:33-29, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SEVEN

(Possession of a Weapon by a Convicted Person - Second Degree)

FRANK BLAKE

on or about April 22, 2021, in the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Aggravated Assault, in violation of N.J.S.A. 2C:12-1b2, on Union County case ID UNN-12-002171-001; or the crime of Aggravated Assault, in violation of N.J.S.A. 2C:12-1b2, on Union County case ID UNN-13-000238-002; or the crime of Aggravated Assault, in violation of N.J.S.A. 2C:12-1b2, on Union County case ID UNN-13-000239-004; or the crime of Conspiracy to Commit Aggravated Assault, in violation of N.J.S.A. 2C:12-1b2 and N.J.S.A. 2C:5-2, on Essex County case ID ESX-08-009586-001, did own, possess or control a firearm, that is, a .357 Magnum caliber Ruger revolver, serial number 154-52137, a .45 auto caliber Springfield Armory semiautomatic pistol, serial number HE111585, or a 9mm Luger SCCY semiautomatic pistol, serial number C004218, 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.



Thomas Eicher, Director
Office of Public Integrity &
Accountability
Division of Criminal Justice

A TRUE BILL:


Foreperson

Dated: 9/14/2021