

**FILED**  
**APRIL 28, 2021**  
**STATE GRAND JURY JUDGE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ756-21-3

Superior Court

Docket Number **21-4-00053-S**

STATE OF NEW JERSEY )

v. )

ROBERTO L. DIAZ-BOURET )

CARL S. MALDONADO )

DIANNE T. STROHMENGER )

LAMONT R. SHULER )

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

ROBERTO L. DIAZ-BOURET

CARL S. MALDONADO

and

DIANNE T. STROHMENGER

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 17, 2019, and on or about April 9, 2019, at the

Borough of Freehold, at the Township of Freehold, at the Township of Wall, in the County of Monmouth, at the Township of Brick, in the County of Ocean, 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, cocaine, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a) (1) and N.J.S.A. 2C:35-5(b) (1);

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

COUNT TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

ROBERTO L. DIAZ-BOURET

and

CARL S. MALDONADO

on or about April 1, 2019, at the Borough of Freehold, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10(a)(1), and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

CARL S. MALDONADO

on or about April 1, 2019, at the Township of Freehold, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10(a)(1), and against the peace of this State, the government and dignity of the same.

COUNT FOUR

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

ROBERTO L. DIAZ-BOURET

and

CARL S. MALDONADO

on or about April 1, 2019, at the Borough of Freehold, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is cocaine, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(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

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

ROBERTO L. DIAZ-BOURET

and

CARL S. MALDONADO

on or about April 1, 2019, at the Borough of Freehold, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Park Avenue Elementary School, which is owned by or leased to the Freehold Borough Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Possession of a Controlled Dangerous Substance - Third Degree)

ROBERTO L. DIAZ-BOURET

on or about April 19, 2019, at the Borough of Freehold, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10(a)(1), and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

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

ROBERTO L. DIAZ-BOURET

on or about April 19, 2019, at the Borough of Freehold, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is cocaine, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1) and N.J.S.A. 2C:35-5(b)(1), and against the peace of this State, the government and dignity of the same.



COUNT EIGHT

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

ROBERTO L. DIAZ-BOURET

on or about April 19, 2019, at the Borough of Freehold, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Park Avenue Elementary School, which is owned by or leased to the Freehold Borough Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Unlawful Possession of a Large Capacity  
Ammunition Magazine - Fourth Degree)

DIANNE T. STROHMENGER

and

LAMONT R. SHULER

on or about April 1, 2019, at the Township of Brick, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did possess a large capacity ammunition magazine, contrary to the provisions of N.J.S.A. 2C:39-3(j), and against the peace of this State, the government and dignity of the same.

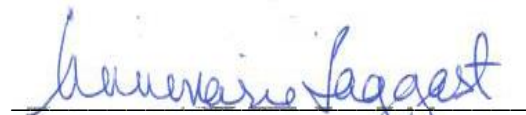
COUNT TEN

(Certain Persons Not to Have Firearms - Second Degree)

LAMONT R. SHULER

on or about April 1, 2019, at the Township of Brick, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of robbery on December 1, 2006, on Monmouth County Indictment 06-02-00266-I, did own, possess, or control the following firearm: a Century Arms Micro Draco 7.62 AK Pistol, contrary to the provisions of N.J.S.A. 2C:39-7(b), and against the peace of this State, the government and dignity of the same.

AAG Veronica Allende, Director  
Division of Criminal Justice



By: AAG Annmarie Taggart  
Deputy Director  
Division of Criminal Justice

A TRUE BILL:

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Foreperson

Dated: 4-28-21