

**COMPLAINT - SUMMONS**

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> <i>VS.</i> <b>ROBERTO GARCIA</b>	
<b>1111</b>	<b>S</b>	<b>2021</b>	<b>001180</b>		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	ADDRESS: <b>NEW JERSEY STATE PRISON</b> <b>600 CASS STREET</b> <b>TRENTON NJ 08611-0000</b>	
<b>TRENTON MUNICIPAL COURT</b> <b>225 N CLINTON AVE</b> <b>TRENTON NJ 08607-0000</b> <b>609-989-3700</b> COUNTY OF: <b>MERCER</b>					
# of CHARGES <b>3</b>	CO-DEFTS <b>8</b>	POLICE CASE #: <b>2020092301</b>		DEFENDANT INFORMATION	
COMPLAINANT NAME: <b>MATTHEW SCHLUSSELFELD</b> <b>168 FRONTAGE ROAD</b> <b>NEWARK NJ 07114</b>			SEX: <b>M</b> EYE COLOR: DRIVER'S LIC. #: SOCIAL SECURITY #: <b>xxx-xx-<span style="background-color: black; color: black;">[REDACTED]</span></b> ( ) TELEPHONE #: LIVESCAN PCN #:		DOB: <b>[REDACTED] 1995</b> DL STATE:

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 09/10/2020 in **TRENTON CITY, MERCER County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, BETWEEN ON OR ABOUT SEPTEMBER 10, 2020 AND APRIL 21, 2021, IN THE CITY OF TRENTON, IN THE COUNTY OF MERCER, AND ELSEWHERE, WHILE KNOWINGLY INVOLVED IN CRIMINAL STREET GANG ACTIVITY, THE SAID ROBERTO GARCIA DID COMMIT, ATTEMPT TO COMMIT, OR CONSPIRE TO COMMIT A SPECIFIED CRIME, WHETHER AS A PRINCIPAL OR AN ACCOMPLICE, FOR THE BENEFIT OF, AT THE DIRECTION OF, OR IN ASSOCIATION WITH A CRIMINAL STREET GANG, THAT IS, THE SAID ROBERTO GARCIA, HAVING PREVIOUSLY COMMITTED AT LEAST ONE AGGRAVATED ASSAULT ON BEHALF OF THE ALKON STREET GANG ON OR ABOUT JUNE 15, 2020, DID COMMIT AN AGGRAVATED ASSAULT ON KS, FOR THE BENEFIT OF, AT THE DIRECTION OF, OR IN ASSOCIATION WITH THE ALKON STREET GANG.

WITHIN THE JURISDICTION OF THIS COURT, BETWEEN ON OR ABOUT SEPTEMBER 10, 2020 AND APRIL 21, 2021, IN THE CITY OF TRENTON, IN THE COUNTY OF MERCER, AND ELSEWHERE, THE SAID ROBERTO GARCIA DID AGREE WITH SUCH OTHER PERSON OR PERSONS  
in violation of:

Original Charge	1) 2C:33-29A	2) 2C:5-2A(2) 2C:12-1B(1)	3) 2C:12-1B(1)
Amended Charge			

**CERTIFICATION:**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: MATTHEW SCHLUSSELFELD Date: 04/28/2021

The complaining witness is a law enforcement officer and a judicial probable cause determination is not required prior to the issuance of this Complaint-Summons.

**SUMMONS**

YOU ARE HEREBY SUMMONED to appear before the Superior Court in the county of: **MERCER**  
at the following address: **MERCER COUNTY SUPERIOR CT**  
**400 SOUTH WARREN ST. TRENTON NJ 08650-0000**  
If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.  
Date of Arrest: **04/28/2021** Appearance Date: **05/12/2021** Time: **09:00AM** Phone: **609-571-4000**  
Signature of Person Issuing Summons: MATTHEW SCHLUSSELFELD Date: 04/28/2021

 Domestic Violence – Confidential

 Related Traffic Tickets  
or Other Complaints

 Serious Personal Injury/ Death  
Involved
**Special conditions of release:**

- No phone, mail or other personal contact w/victim  
 No possession firearms/weapons  
 Other (specify):

**ORIGINAL**

**COMPLAINT - SUMMONS**

COMPLAINT NUMBER				STATE V.	ROBERTO GARCIA
<b>1111</b>	<b>S</b>	<b>2021</b>	<b>001180</b>		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		

THAT THEY OR ONE OR MORE OF THEM WILL ENGAGE IN CONDUCT WHICH CONSTITUTES SUCH CRIME OR AN ATTEMPT OR SOLICITATION TO COMMIT SUCH CRIME AND/OR AGREES TO AID SUCH OTHER PERSON OR PERSONS IN THE PLANNING OR COMMISSION OF SUCH CRIME OR OF AN ATTEMPT OR SOLICITATION TO COMMIT SUCH CRIME, THAT IS, THE SAID ROBERTO GARCIA DID CONSPIRE WITH OTHER MEMBERS OF THE ALMIGHTY LATIN KING AND QUEEN NATION TO COMMIT AGGRAVATED ASSAULT AGAINST AN INDIVIDUAL WITH THE INITIALS KS, ATTEMPTED AGGRAVATED ASSAULT, AGAINST AN INDIVIDUAL WITH THE INITIALS DK, AND/OR TERRORISTIC THREATS AGAINST MEMBERS OF LAW ENFORCEMENT, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:5-2.

WITHIN THE JURISDICTION OF THIS COURT, BETWEEN ON OR ABOUT DECEMBER 1, 2020, AND ON OR ABOUT FEBRUARY 28, 2021, IN THE CITY OF TRENTON, IN THE COUNTY OF MERCER, AND ELSEWHERE, THE SAID ROBERTO GARCIA DID CAUSE SERIOUS BODILY INJURY TO ANOTHER, OR DID CAUSE INJURY PURPOSELY OR KNOWINGLY OR UNDER CIRCUMSTANCES MANIFESTING EXTREME INDIFFERENCE TO THE VALUE OF HUMAN LIFE RECKLESSLY CAUSES SUCH INJURY, THAT IS, THE SAID ROBERTO GARCIA DID CAUSE SERIOUS BODILY INJURY TO AN INDIVIDUAL WITH THE INITIALS KS, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:12-1B1, AND AGAINST THE PEACE OF THIS STATE, THE GOVERNMENT, AND DIGNITY OF THE SAME.

Original Charge			
Amended Charge			

**COMPLAINT - SUMMONS**

# COMPLAINT – SUMMONS (Court Action)

COMPLAINT NUMBER				STATE V.
<b>1111</b>	<b>S</b>	<b>2021</b>	<b>001180</b>	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	

**ROBERTO GARCIA**

<b>FTA Bail Information</b>	Date Bail Set: _____	Amount Bail Set: \$ _____ by: _____	<input type="checkbox"/> Bail Recog. Attached
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Released on Bail	R.O.R.	Committed Default	Committed w/o Bail	Place Committed: _____	Date Referred to County Prosecutor: _____
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Date of First Appearance: <b>05/12/2021</b>	<input type="checkbox"/> Advised of Rights by _____	Defendant Desires Counsel: <input type="checkbox"/> Yes <input type="checkbox"/> No
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Prosecuting Attorney Information				Defense Counsel Information					
<b>Name:</b>				<b>Name:</b>					
State	County	Municipal	Other	None	Retained	Public Def	Assigned	Waived	Other

Original Charge	1) <b>2C:33-29A</b>	2) <b>2C:5-2A(2)</b> <b>2C:12-1B(1)</b>	3) <b>2C:12-1B(1)</b>
Amended Charge			
Waiver Indt/Jury			
Plea/Date of Plea	Plea: _____ Date: _____	Plea: _____ Date: _____	Plea: _____ Date: _____
Adjudication (* see code)	Finding Code: _____ Date: _____	Finding Code: _____ Date: _____	Finding Code: _____ Date: _____
Jail Term	Jail time credit _____ Susp. Imp _____	Jail time credit _____ Susp. Imp _____	Jail time credit _____ Susp. Imp _____
Probation Term	Susp. Imp _____	Susp. Imp _____	Susp. Imp _____
Cond. Discharge Term			
Community Service			
D/L Suspension Term			
Fines/Costs	Fines: _____ Costs: _____	Fines: _____ Costs: _____	Fines: _____ Costs: _____
VCCB/SNSF	VCCB: _____ SNSF: _____	VCCB: _____ SNSF: _____	VCCB: _____ SNSF: _____
DEDR/Lab Fee	DEDR: _____ LAB: _____	DEDR: _____ LAB: _____	DEDR: _____ LAB: _____
CD Fee/Drug Ed Fnd	CD: _____ DAEF: _____	CD: _____ DAEF: _____	CD: _____ DAEF: _____
DV Surch/Other Fees	DV: _____ Other: _____	DV: _____ Other: _____	DV: _____ Other: _____
Restitution Beneficiary: _____			

**Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes:**  
 THIS CASE IS ASSIGNED TO DEPUTY ATTORNEY GENERAL COLIN KEIFFER OF THE NEW JERSEY ATTORNEY GENERAL'S OFFICE- KEIFFERC@NJDCJ.ORG

- \* Finding Codes
- 1 – Guilty
  - 2 – Not Guilty
  - 3 – Dismissed – Other
  - 4 – Guilty but Merged
  - 5 – Dismissed-Rule
  - 6 – Dismissed Lack of Prosecution
  - 7 – Dismissed – Pros Motion/Vic Req
  - 8 – Conditional Discharge
  - D – Dismissed- Prosecutor Discretion
  - M – Dismissed- Mediation
  - P – Dismissed-Plea Agreement
  - S – Disposed at Superior
  - W – Dismissed-False ID

**Related Traffic Tickets and Complaints:**

# COMPLAINT – SUMMONS (Court Action)

<b>COMPLAINT NUMBER</b>				<b>STATE V.</b>
<b>1111</b>	<b>S</b>	<b>2021</b>	<b>001180</b>	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	

**ROBERTO GARCIA**

<b>FTA Bail Information</b>		Date Bail Set: _____	Amount Bail Set: \$ _____ by: _____	<input type="checkbox"/> Bail Recog. Attached
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Released on Bail	R.O.R.	Committed Default	Committed w/o Bail	Place Committed: _____	Date Referred to County Prosecutor: _____
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Date of First Appearance: <b>05/12/2021</b>	<input type="checkbox"/> Advised of Rights by _____	Defendant Desires Counsel: <input type="checkbox"/> Yes <input type="checkbox"/> No
---	---	--

Prosecuting Attorney Information				Defense Counsel Information					
<b>Name:</b>				<b>Name:</b>					
State	County	Municipal	Other	None	Retained	Public Def	Assigned	Waived	Other

Original Charge									
Amended Charge									
Waiver Indt/Jury									
Plea/Date of Plea	Plea:	Date:		Plea:	Date:		Plea:	Date:	
Adjudication (* see code)	Finding Code:	Date:		Finding Code:	Date:		Finding Code:	Date:	
Jail Term		Jail time credit	Susp. Imp		Jail time credit	Susp. Imp		Jail time credit	Susp. Imp
Probation Term									
Cond. Discharge Term									
Community Service									
D/L Suspension Term									
Fines/Costs	Fines:	Costs:		Fines:	Costs:		Fines:	Costs:	
VCCB/SNSF	VCCB:	SNSF:		VCCB:	SNSF:		VCCB:	SNSF:	
DEDR/Lab Fee	DEDR:	LAB:		DEDR:	LAB:		DEDR:	LAB:	
CD Fee/Drug Ed Fnd	CD:	DAEF:		CD:	DAEF:		CD:	DAEF:	
DV Surch/Other Fees	DV:	Other:		DV:	Other:		DV:	Other:	
Restitution Beneficiary: _____									

**Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes:**  
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- \* Finding Codes
- 1 – Guilty
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  - P - Dismissed-Plea Agreement
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**Related Traffic Tickets and Complaints:**

**COMPLAINT - SUMMONS (DEFENDANT'S COPY)**

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> <i>VS.</i> <b>ROBERTO GARCIA</b>	
<b>1111</b>	<b>S</b>	<b>2021</b>	<b>001180</b>		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	ADDRESS: <b>NEW JERSEY STATE PRISON</b> <b>600 CASS STREET</b> <b>TRENTON NJ 08611-0000</b>	
<b>TRENTON MUNICIPAL COURT</b> <b>225 N CLINTON AVE</b> <b>TRENTON NJ 08607-0000</b> <b>609-989-3700</b> COUNTY OF: <b>MERCER</b>					
# of CHARGES 3	CO-DEFTS 8	POLICE CASE #: 2020092301		DEFENDANT INFORMATION	
COMPLAINANT NAME: <b>MATTHEW SCHLUSSELFELD</b>			SEX: <b>M</b> EYE COLOR:	DOB: [REDACTED] <b>1995</b>	DL STATE:
			DRIVER'S LIC. #:	SBI #:	
			SOCIAL SECURITY #: <b>xxx-xx-[REDACTED]</b>	TELEPHONE #:	( )
			LIVSCAN PCN #:		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 09/10/2020 in **TRENTON CITY**, **MERCER** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, BETWEEN ON OR ABOUT SEPTEMBER 10, 2020 AND APRIL 21, 2021, IN THE CITY OF TRENTON, IN THE COUNTY OF MERCER, AND ELSEWHERE, WHILE KNOWINGLY INVOLVED IN CRIMINAL STREET GANG ACTIVITY, THE SAID ROBERTO GARCIA DID COMMIT, ATTEMPT TO COMMIT, OR CONSPIRE TO COMMIT A SPECIFIED CRIME, WHETHER AS A PRINCIPAL OR AN ACCOMPLICE, FOR THE BENEFIT OF, AT THE DIRECTION OF, OR IN ASSOCIATION WITH A CRIMINAL STREET GANG, THAT IS, THE SAID ROBERTO GARCIA, HAVING PREVIOUSLY COMMITTED AT LEAST ONE AGGRAVATED ASSAULT ON BEHALF OF THE ALKON STREET GANG ON OR ABOUT JUNE 15, 2020, DID COMMIT AN AGGRAVATED ASSAULT ON KS, FOR THE BENEFIT OF, AT THE DIRECTION OF, OR IN ASSOCIATION WITH THE ALKON STREET GANG.

WITHIN THE JURISDICTION OF THIS COURT, BETWEEN ON OR ABOUT SEPTEMBER 10, 2020 AND APRIL 21, 2021, IN THE CITY OF TRENTON, IN THE COUNTY OF MERCER, AND ELSEWHERE, THE SAID ROBERTO GARCIA DID AGREE WITH SUCH OTHER PERSON OR PERSONS  
**in violation of:**

Original Charge	1) 2C:33-29A	2) 2C:5-2A(2) 2C:12-1B(1)	3) 2C:12-1B(1)
Amended Charge			

**CERTIFICATION:**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment

Signed: MATTHEW SCHLUSSELFELD Date: 04/28/2021

The complaining witness is a law enforcement officer and a judicial probable cause determination is not required prior to the issuance of this Complaint-Summons.

**SUMMONS**

YOU ARE HEREBY SUMMONED to appear before the Superior Court in the county of: **MERCER**

at the following address: **MERCER COUNTY SUPERIOR CT**

**400 SOUTH WARREN ST.**

**TRENTON**

**NJ 08650-0000**

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest: **04/28/2021** Appearance Date: **05/12/2021** Time: **09:00AM** Phone: **609-571-4000**

Signature of Person Issuing Summons: MATTHEW SCHLUSSELFELD Date: 04/28/2021

Domestic Violence – Confidential

Related Traffic Tickets  
or Other Complaints

Serious Personal Injury/ Death  
Involved

**Special conditions of release:**

- No phone, mail or other personal contact w/victim  
 No possession firearms/weapons  
 Other (specify):

**COMPLAINT - SUMMONS (DEFENDANT'S COPY)**

**COMPLAINT - SUMMONS (DEFENDANT'S COPY)****COMPLAINT NUMBER****1111****S****2021****001180****STATE V.****ROBERTO GARCIA**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

THAT THEY OR ONE OR MORE OF THEM WILL ENGAGE IN CONDUCT WHICH CONSTITUTES SUCH CRIME OR AN ATTEMPT OR SOLICITATION TO COMMIT SUCH CRIME AND/OR AGREES TO AID SUCH OTHER PERSON OR PERSONS IN THE PLANNING OR COMMISSION OF SUCH CRIME OR OF AN ATTEMPT OR SOLICITATION TO COMMIT SUCH CRIME, THAT IS, THE SAID ROBERTO GARCIA DID CONSPIRE WITH OTHER MEMBERS OF THE ALMIGHTY LATIN KING AND QUEEN NATION TO COMMIT AGGRAVATED ASSAULT AGAINST AN INDIVIDUAL WITH THE INITIALS KS, ATTEMPTED AGGRAVATED ASSAULT, AGAINST AN INDIVIDUAL WITH THE INITIALS DK, AND/OR TERRORISTIC THREATS AGAINST MEMBERS OF LAW ENFORCEMENT, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:5-2.

WITHIN THE JURISDICTION OF THIS COURT, BETWEEN ON OR ABOUT DECEMBER 1, 2020, AND ON OR ABOUT FEBRUARY 28, 2021, IN THE CITY OF TRENTON, IN THE COUNTY OF MERCER, AND ELSEWHERE, THE SAID ROBERTO GARCIA DID CAUSE SERIOUS BODILY INJURY TO ANOTHER, OR DID CAUSE INJURY PURPOSELY OR KNOWINGLY OR UNDER CIRCUMSTANCES MANIFESTING EXTREME INDIFFERENCE TO THE VALUE OF HUMAN LIFE RECKLESSLY CAUSES SUCH INJURY, THAT IS, THE SAID ROBERTO GARCIA DID CAUSE SERIOUS BODILY INJURY TO AN INDIVIDUAL WITH THE INITIALS KS, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:12-1B1, AND AGAINST THE PEACE OF THIS STATE, THE GOVERNMENT, AND DIGNITY OF THE SAME.

Original Charge

Amended Charge

**COMPLAINT - SUMMONS (DEFENDANT'S COPY)****Page 6 of 11**

NJ/CDR1 1/1/2017

# RETURN OF SERVICE INFORMATION

COMPLAINT NUMBER				THE STATE OF NEW JERSEY	
<b>1111</b>	<b>S</b>	<b>2021</b>	<b>001180</b>	VS.	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	ROBERTO GARCIA	
TRENTON MUNICIPAL COURT 225 N CLINTON AVE TRENTON NJ 08607-0000 609-989-3700 COUNTY OF: MERCER				ADDRESS: NEW JERSEY STATE PRISON 600 CASS STREET TRENTON NJ 08611-0000	
# of CHARGES 3	CO-DEFTS 8	POLICE CASE #: 2020092301		DEFENDANT INFORMATION	
COMPLAINANT MATTHEW SCHLUSSELFELD NAME: 168 FRONTAGE ROAD NEWARK NJ 07114				SEX: M EYE COLOR: DOB: [REDACTED] 1995	DL STATE:
				DRIVER'S LIC. #:	
				SOCIAL SECURITY # xxx-xx-[REDACTED]	SBI #:
				TELEPHONE #:	( )
				LIVSCAN PCN #:	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 09/10/2020 in **TRENTON CITY**, **MERCER** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, BETWEEN ON OR ABOUT SEPTEMBER 10, 2020 AND APRIL 21, 2021, IN THE CITY OF TRENTON, IN THE COUNTY OF MERCER, AND ELSEWHERE, WHILE KNOWINGLY INVOLVED IN CRIMINAL STREET GANG ACTIVITY, THE SAID ROBERTO GARCIA DID COMMIT, ATTEMPT TO COMMIT, OR CONSPIRE TO COMMIT A SPECIFIED CRIME, WHETHER AS A PRINCIPAL OR AN ACCOMPLICE, FOR THE BENEFIT OF, AT THE DIRECTION OF, OR IN ASSOCIATION WITH A CRIMINAL STREET GANG, THAT IS, THE SAID ROBERTO GARCIA, HAVING PREVIOUSLY COMMITTED AT LEAST ONE AGGRAVATED ASSAULT ON BEHALF OF THE ALKQON STREET GANG ON OR ABOUT JUNE 15, 2020, DID COMMIT AN AGGRAVATED ASSAULT ON KS, FOR THE BENEFIT OF, AT THE DIRECTION OF, OR IN ASSOCIATION WITH THE ALKQON STREET GANG.

WITHIN THE JURISDICTION OF THIS COURT, BETWEEN ON OR ABOUT SEPTEMBER 10, 2020 AND APRIL 21, 2021, IN THE CITY OF TRENTON, IN THE COUNTY OF MERCER, AND ELSEWHERE, THE SAID ROBERTO GARCIA DID AGREE WITH SUCH OTHER PERSON OR PERSONS **in violation of:**

Original Charge	1) 2C:33-29A	2) 2C:5-2A(2) 2C:12-1B(1)	3) 2C:12-1B(1)
-----------------	--------------	------------------------------	----------------

Check √	<b>Certification by Police Regarding Complaint-Summons</b>
✓	I certify that I served the complaint-summons by delivering a copy to the defendant personally.
	I certify that I personally served the complaint-summons by leaving a copy at the defendant's usual place of abode with a competent member of the household of the age 14 or over _____ Name of family member over 14 years of age
	I certify that I mailed a copy of the complaint-summons by ordinary mail to the defendant at his or her last known address. _____ Defendant's last known address
	I certify that I served the complaint-summons by delivering a copy to a person authorized to receive service of process on the defendant's behalf. _____ Name and title of authorized person
	Other manner of service: I certify that I served the complaint-summons in the following manner: _____
	I certify that I was unable to serve the complaint-summons.

Signed: MATTHEW SCHLUSSELFELD NJ STATE DEPT OF CORRECTIONS Date of Action: 04/28/2021  
Name, Title and Department of Officer

## RETURN OF SERVICE INFORMATION

## RETURN OF SERVICE INFORMATION

COMPLAINT NUMBER				STATE V.	ROBERTO GARCIA
1111	S	2021	001180		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		

THAT THEY OR ONE OR MORE OF THEM WILL ENGAGE IN CONDUCT WHICH CONSTITUTES SUCH CRIME OR AN ATTEMPT OR SOLICITATION TO COMMIT SUCH CRIME AND/OR AGREES TO AID SUCH OTHER PERSON OR PERSONS IN THE PLANNING OR COMMISSION OF SUCH CRIME OR OF AN ATTEMPT OR SOLICITATION TO COMMIT SUCH CRIME, THAT IS, THE SAID ROBERTO GARCIA DID CONSPIRE WITH OTHER MEMBERS OF THE ALMIGHTY LATIN KING AND QUEEN NATION TO COMMIT AGGRAVATED ASSAULT AGAINST AN INDIVIDUAL WITH THE INITIALS KS, ATTEMPTED AGGRAVATED ASSAULT, AGAINST AN INDIVIDUAL WITH THE INITIALS DK, AND/OR TERRORISTIC THREATS AGAINST MEMBERS OF LAW ENFORCEMENT, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:5-2.

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Original Charge			
Amended Charge			

**RETURN OF SERVICE INFORMATION**

**Page 8 of 11**

NJ/CDR1 1/1/2017



# Affidavit of Probable Cause

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> VS. <b>ROBERTO GARCIA</b>	
1111	S	2021	001180		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
<b>TRENTON MUNICIPAL COURT</b> 225 N CLINTON AVE TRENTON NJ 08607-0000 609-989-3700 COUNTY OF: <b>MERCER</b>				ADDRESS: <b>NEW JERSEY STATE PRISON</b> <b>600 CASS STREET</b> <b>TRENTON NJ 08611-0000</b>	
# of CHARGES 3	CO-DEFTS	POLICE CASE #: 2020092301		DEFENDANT INFORMATION	
COMPLAINANT <b>MATTHEW SCHLUSSELFELD</b> NAME: <b>168 FRONTAGE ROAD</b>  <b>NEWARK NJ 07114</b>				SEX: <b>M</b> EYE COLOR: DOB: [REDACTED] <b>1995</b> DRIVER'S LIC. #. DL STATE: SOCIAL SECURITY #: <b>xxx-xx-[REDACTED]</b> SBI #: TELEPHONE #: ( ) LIVESCAN PCN #:	

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:  
 Roberto Garcia is a member of the "500 Savages" a/k/a "500 Royal Mob" hit squad, a unit within the Almighty Latin King and Queen Nation ("ALKQN") created and authorized by Frank Blake in or around December 2020. The Honorable Judge Darlene Pereksta found probable cause and authorized an Order in Support of Arrest pursuant to DP-MER-2645-SW-21. Authorized by DAG Colin Keiffer of DCJ/OPIA. The State has elected to proceed on a summons.

**Affidavit of Probable Cause**

## Affidavit of Probable Cause

COMPLAINT NUMBER			
<b>1111</b>	<b>S</b>	<b>2021</b>	<b>001180</b>
COURT CODE	PREFIX	YEAR	SEQUENCE NO.

**THE STATE OF NEW JERSEY**

**VS.**

**ROBERTO GARCIA**

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

Joint investigation between the New Jersey Department of Corrections: Special Investigations Division and NJ Division of Criminal Justice: Office of Public Integrity and Accountability.

3. If victim was injured, provide the extent of the injury:

Inmate K.S. suffered injuries and had to seek outside medical treatment at a hospital.

**Certification:**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: MATTHEW SCHLUSSELFELD LAW ENFORCEMENT OFFICER

Date: 04/28/2021

**Affidavit of Probable Cause**

**Page 10 of 11**

1/1/2017

# Preliminary Law Enforcement Incident Report

COMPLAINT NUMBER				<b><i>THE STATE OF NEW JERSEY</i></b> VS. <b>ROBERTO GARCIA</b>  ADDRESS: <b>NEW JERSEY STATE PRISON</b> <b>600 CASS STREET</b> <b>TRENTON NJ 08611-0000</b>	
<b>1111</b>	<b>S</b>	<b>2021</b>	<b>001180</b>		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
<b>TRENTON MUNICIPAL COURT</b> <b>225 N CLINTON AVE</b> <b>TRENTON NJ 08607-0000</b> <b>609-989-3700 COUNTY OF: MERCER</b>					
# of CHARGES 3	CO-DEFTS	POLICE CASE #: 2020092301		DEFENDANT INFORMATION SEX: M EYE COLOR: DOB: [REDACTED] 1995 DRIVER'S LIC. #. DL STATE: SOCIAL SECURITY #: xxx-xx-[REDACTED] SBI #: ( ) TELEPHONE #: LIVSCAN PCN #:	
COMPLAINANT <b>MATTHEW SCHLUSSELFELD</b> NAME: <b>168 FRONTAGE ROAD</b>  <b>NEWARK NJ 07114</b>					

**Purpose:** The Preliminary Law Enforcement Incident Report (PLEIR) is intended to document basic information known to the officer at the time of its preparation. It is recognized that additional relevant information will emerge as an investigation continues. The PLEIR shall be in addition to, not in lieu of, any regular police arrest, incident, or investigation reports. Note that the PLEIR is specific to each defendant charged in an investigation.

- The offense/incident was recorded using electronic/surveillance via:
  - Surveillance Camera
- The victim was injured and:
  - Victim transported to medical facility
- Physical evidence was seized/recovered:
  - Other Type(s) of physical evidence clothing
- The case involves a search warrant(s).
- The investigation involved the seizure of one or more cellphones, computers or similar electronic devices.  
List the type of device(s) and total number of each recovered: (2) cellphones
- Additional information relevant to the offense(s) charged: Authorized by DAG Colin Keiffer of DCJ/OPIA.

**Certification:**  
 I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.  
 Signed: MATTHEW SCHLUSSELFELD LAW ENFORCEMENT OFFICER Date: 04/28/2021