

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ755-21-6
Superior Court
Docket Number 21-5-76-S

STATE OF NEW JERSEY)
v.)
TIMOTHY GUEST)
CARLOS RIVERA)
WILLIAM WOODLEY)
ALICIA BENTON)
HANEEFA ROME)
BARRY JAMES)
GEORGE ENCARNACION)
JONATHAN PEREZ-PAYANO)
STEFFANY CASTILLO-)
CANDALARI)
NELFY ULERIO)
AND)
LEE HUDSON)

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon their

oaths, present that:

COUNT ONE

(Racketeering - First Degree)

TIMOTHY GUEST

CARLOS RIVERA

WILLIAM WOODLEY

ALICIA BENTON

HANEEFA ROME

BARRY JAMES

GEORGE ENCARNACION

JONATHAN PEREZ-PAYANO

STEFFANY CASTILLO-CANDALARI

NELFY ULERIO

AND

LEE HUDSON

and other persons whose identities are known and unknown to the Grand Jurors, who are named as 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 the enterprise engaged in 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, a crime of the first degree, 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 April 18, 2018, and on or about July 7, 2019, at the Town of Harrison, at the Town of Secaucus, both in the County of Hudson, at the Town of Irvington, at the City of Newark, at the City of East Orange, all in the County of Essex, in the State of New Jersey, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

TIMOTHY GUEST, CARLOS RIVERA, WILLIAM WOODLEY, ALICIA BENTON, HANEEFA ROME, BARRY JAMES, GEORGE ENCARNACION, JONATHAN PEREZ-PAYANO, STEFFANY CASTILLO-CANDALARI, NELFY ULERIO, LEE HUDSON, and other persons whose identities are known and unknown to the Grand Jurors, who are named as 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 leader of a narcotics trafficking network; maintaining a controlled dangerous substance production facility; possession with intent to distribute a controlled dangerous substance; and money laundering;
- 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 and/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, using associates to lease and/or buy vehicles to conceal the drivers of the vehicles, using 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 Leader of a Narcotics Trafficking Network, (N.J.S.A. 2C:35-3); Maintaining a Controlled Dangerous Substance Production Facility (N.J.S.A. 2C:35-4); Possession with Intent to Distribute Controlled Dangerous Substances (N.J.S.A. 2C:35-5); Money Laundering (N.J.S.A. 2C:21-25); and Conspiracy to commit these crimes, as described herein and in Counts Two, Three, Five, Ten, Eleven, Twelve, Thirteen, Sixteen, Seventeen, Eighteen, Twenty-Five, Twenty-Six, Twenty-Seven, Twenty-Eight, Twenty-Nine, Thirty, Thirty-One, Thirty-Two, Thirty-Three, Thirty-Six, Thirty-Seven, Thirty-Eight, Forty-Two, Forty-Three, and Forty-Four of this Indictment.

TIMOTHY GUEST

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy, Leader of a Narcotics Trafficking Network; Maintaining a Controlled Dangerous Substance Production Facility; Possession with Intent to Distribute a Controlled Dangerous Substance; and Money Laundering; which racketeering conduct is the subject of Counts Two, Three, Five, Ten, Eleven, Twelve, Thirteen, Seventeen, Eighteen, Twenty-Five, Twenty-Six, Twenty-Seven, Twenty-Eight, Twenty-Nine, Thirty,

Thirty-One, and Thirty-Two of this Indictment.

CARLOS RIVERA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Maintaining a Controlled Dangerous Substance Production Facility; and Possession with Intent to Distribute a Controlled Dangerous Substance; which racketeering conduct is the subject of Counts Two, Five, Ten, and Eleven of this Indictment.

WILLIAM WOODLEY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Maintaining a Controlled Dangerous Substance Production Facility; Possession with Intent to Distribute a Controlled Dangerous Substance; and Money Laundering which racketeering conduct is the subject of Counts Two, Five, Ten, Eleven, and Seventeen of this Indictment.

ALICIA BENTON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; which racketeering conduct is the subject of Count Two and Count Five of this Indictment.

HANEEFA ROME

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Maintaining a Controlled Dangerous Substance Production Facility; Possession with Intent to

Distribute a Controlled Dangerous Substance; and Money Laundering which racketeering conduct is the subject of Counts Two, Eighteen, Twenty-Five, Twenty-Six, Twenty-Seven, Twenty-Eight, Twenty-Nine, Thirty, Thirty-One, and Thirty-Two of this Indictment.

BARRY JAMES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Maintaining a Controlled Dangerous Substance Production Facility; Possession with Intent to Distribute a Controlled Dangerous Substance; and Money Laundering; which racketeering conduct is the subject of Counts Two, Eighteen, Twenty-Seven, Twenty-Eight, Twenty-Nine, Thirty, Thirty-One, and Thirty-Two of this Indictment.

GEORGE ENCARNACION

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Maintaining a Controlled Dangerous Substance Production Facility; Possession with Intent to Distribute a Controlled Dangerous Substance; and Money Laundering; which racketeering conduct is the subject of Counts Two, Thirty-Three, Thirty-Six, Thirty-Seven, Thirty-Eight, Forty-Two, and Forty-Three of this Indictment.

JONATHAN PEREZ-PAYANO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; Maintaining a Controlled

Dangerous Substance Production Facility; Possession with Intent to Distribute a Controlled Dangerous Substance; and Money Laundering; which racketeering conduct is the subject of Counts Two, Thirty-Three, Thirty-Six, Thirty-Seven, Thirty-Eight, and Forty-Four of this Indictment.

STEFFANY CASTILLO-CANDALARI

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; which racketeering conduct is the subject of Counts Two and Forty-Four of this Indictment.

LEE HUDSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Conspiracy; which racketeering conduct is the subject of Count Two 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)

TIMOTHY GUEST

CARLOS RIVERA

WILLIAM WOODLEY

ALICIA BENTON

HANEEFA ROME

BARRY JAMES

GEORGE ENCARNACION

JONATHAN PEREZ-PAYANO

STEFFANY CASTILLO-CANDALARI

NELFY ULERIO

AND

LEE HUDSON

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 April 18, 2018, and on or about July 7, 2019, at the Town of Harrison, at the Town of Secaucus, both in the County of Hudson, at the Town of Irvington, at the City of Newark, at the City of East Orange, all in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of distribution of a

controlled dangerous substance and maintaining or operating or knowingly participating in the maintenance or operations of a premise, place, or facility, used for manufacturing controlled dangerous substances, that is, heroin and/or fentanyl, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes, or

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

1. Knowingly or purposely distribute a controlled dangerous substance, that is, heroin, in a quantity of five ounces or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(1);

2. Knowingly or purposely distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, in a quantity of one 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(4); and

3. Knowingly maintain or operate or knowingly participate in the maintenance or operations of a premise, place, or facility used for manufacturing

controlled dangerous substances, that is, heroin and/or
fentanyl, contrary to the provisions of N.J.S.A. 2C:35-
4.

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

COUNT THREE

(Leader of a Narcotics Trafficking Network - First Degree)

TIMOTHY GUEST

between on or about April 18, 2018, and on or about July 7, 2019, at the Town of Harrison, at the Town of Secaucus, both in the County of Hudson, at the Town of Irvington, at the City of Newark, both 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 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, and/or fentanyl, a Schedule II 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 FOUR

(Promoting Organized Street Crime - First Degree)

TIMOTHY GUEST

AND

GEORGE ENCARNACION

between on or about April 18, 2018, and on or about July 7, 2019, at the Town of Harrison, at the Town of Secaucus, both in the County of Hudson, at the Town of Irvington, at the City of Newark, both 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, Distribution of a Controlled Dangerous Substance, and/or Possession with Intent to Distribute a Controlled Dangerous Substance, in violation of N.J.S.A. 2C:35-5a(1) and b; 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 FIVE

(Maintaining or Operating a Controlled Dangerous Substance
Facility - First Degree)

TIMOTHY GUEST

CARLOS RIVERA

ALICIA BENTON

AND

WILLIAM WOODLEY

between on or about June 16, 2018, and on or about March 15, 2019,
at the Town of Harrison, in the County of Hudson, elsewhere, and
within the jurisdiction of this Court, knowingly did maintain or
operate or knowingly did participate in the maintenance or
operations of a premise, place, or facility used for manufacturing
controlled dangerous substances, that is, heroin and/or fentanyl,
contrary to the provisions of N.J.S.A. 2C:35-4, N.J.S.A. 2C:2-6,
and against the peace of this State, the government and dignity of
the same.

COUNT SIX

(Possession of a Controlled Dangerous Substance - Third Degree)

TIMOTHY GUEST

CARLOS RIVERA

AND

WILLIAM WOODLEY

between on or about March 14, 2019, and on or about March 15, 2019, at the Town of Harrison, in the County of Hudson, 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 N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Possession of a Controlled Dangerous Substance - Third Degree)

TIMOTHY GUEST

CARLOS RIVERA

AND

WILLIAM WOODLEY

between on or about March 14, 2019, and on or about March 15, 2019, at the Town of Harrison, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, fentanyl, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Possession of a Controlled Dangerous Substance - Third Degree)

TIMOTHY GUEST

between on or about March 14, 2019, and on or about March 15, 2019, at the Town of Harrison, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, methamphetamine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

TIMOTHY GUEST

on or about March 14, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, fentanyl, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT TEN

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

TIMOTHY GUEST

CARLOS RIVERA

AND

WILLIAM WOODLEY

between on or about March 14, 2019 and on or about March 15, 2019,
at the Town of Harrison, in the County of Hudson, elsewhere, and
within the jurisdiction of this Court, knowingly or purposely did
possess with intent to distribute a controlled dangerous
substance, that is, heroin, in a quantity of five ounces or more,
including any adulterants or dilutants, contrary to the provisions
of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(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

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

TIMOTHY GUEST

CARLOS RIVERA

AND

WILLIAM WOODLEY

between on or about March 14, 2019 and on or about March 15, 2019,
at the Town of Harrison, in the County of Hudson, elsewhere, and
within the jurisdiction of this Court, knowingly or purposely did
possess with intent to distribute a controlled dangerous
substance, that is, fentanyl, a schedule II narcotic drug, in a
quantity of one ounce or more, including any adulterants or
dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1),
N.J.S.A. 2C:35-5b(4), and N.J.S.A. 2C:2-6, and against the peace
of this State, the government and dignity of the same.

COUNT TWELVE

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

TIMOTHY GUEST

on or about March 15, 2019, at the Town of Harrison, in the County
of Hudson, elsewhere, and within the jurisdiction of this Court,
knowingly or purposely did possess with intent to distribute a
controlled dangerous substance, that is, methamphetamine, contrary
to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-
5b(9)(b), and against the peace of this State, the government and
dignity of the same.

COUNT THIRTEEN

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

TIMOTHY GUEST

on or about March 14, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, in a quantity of one 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(4), and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Eluding - Second Degree)

TIMOTHY GUEST

on or about March 14, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while operating a motor vehicle on any street or highway in this State, knowingly fled or attempted to elude any police or law enforcement officer after having received a signal from such officer to bring the vehicle to a full stop, and the flight or attempt to elude created a risk of death or injury to any person, contrary to the provisions of N.J.S.A. 2C:29-2b, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Resisting Arrest - Fourth Degree)

CARLOS RIVERA

on or about March 14, 2019, at the Town of Harrison, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, purposely prevented Detective Jason Wiswesser, a law enforcement officer of the New Jersey State Police, from effecting a lawful arrest by flight, contrary to the provisions of N.J.S.A. 2C:29-2(a)(3), and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Money Laundering - Third Degree)

WILLIAM WOODLEY

on or about March 14, 2019, at the Town of Harrison, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, approximately \$904 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25a, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Money Laundering - First Degree)

TIMOTHY GUEST

on or about March 14, 2019, and on or about March 15, 2019, at the Town of Harrison, at the Town of Secaucus, both in the County of Hudson, at the City Of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, approximately \$194,096 in U.S. currency, a Bentley valued at approximately \$293,000, and a Range Rover valued at approximately \$130,000, contrary to the provisions of N.J.S.A. 2C:21-25a, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Maintaining or Operating a Controlled Dangerous Substance
Facility - First Degree)

TIMOTHY GUEST

BARRY JAMES

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did maintain or operate or knowingly did participate in the maintenance or operations of a premise, place, or facility used for manufacturing controlled dangerous substances, that is, heroin and/or fentanyl and/or cocaine, contrary to the provisions of N.J.S.A. 2C:35-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

TIMOTHY GUEST

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, fentanyl, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Possession of a Controlled Dangerous Substance - Third Degree)

TIMOTHY GUEST

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Possession of a Controlled Dangerous Substance - Third Degree)

TIMOTHY GUEST

BARRY JAMES

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

TIMOTHY GUEST

BARRY JAMES

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, fentanyl, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

TIMOTHY GUEST

BARRY JAMES

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

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

TIMOTHY GUEST

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(5) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

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

TIMOTHY GUEST

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

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

TIMOTHY GUEST

BARRY JAMES

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, 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), N.J.S.A. 2C:35-5b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

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

TIMOTHY GUEST

BARRY JAMES

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the
County of Essex, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did possess with intent to
distribute a controlled dangerous substance, that is, fentanyl,
a schedule II narcotic drug, in a quantity of one ounce or more,
including any adulterants or dilutants, contrary to the
provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(4) and
N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT TWENTY-EIGHT

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

TIMOTHY GUEST

BARRY JAMES

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in a quantity of one half ounce or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

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

TIMOTHY GUEST

BARRY JAMES

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin and/or fentanyl and/or cocaine, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of Irvington High School which is owned by or leased to the Irvington 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 THIRTY

(Money Laundering - Third Degree)

TIMOTHY GUEST

BARRY JAMES

AND

HANEEFA ROME

on or about April 1, 2019, at the Town of Irvington, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, approximately \$4,886 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Maintaining or Operating a Controlled Dangerous Substance
Facility - First Degree)

GEORGE ENCARNACION

NELFY ULERIO

AND

JONATHAN PEREZ-PAYANO

on or about July 1, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did maintain or operate or knowingly did participate in the maintenance or operations of a premise, place, or facility used for manufacturing controlled dangerous substances, that is, heroin and/or fentanyl, contrary to the provisions of N.J.S.A. 2C:35-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

GEORGE ENCARNACION

JONATHAN PEREZ-PAYANO

AND

NELFY ULERIO

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

COUNT THIRTY-THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

GEORGE ENCARNACION

JONATHAN PEREZ-PAYANO

AND

NELFY ULERIO

on or about July 1, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, fentanyl, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

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

GEORGE ENCARNACION

JONATHAN PEREZ-PAYANO

AND

NELFY ULERIO

on or about July 1, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, 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), N.J.S.A. 2C:35-5b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FIVE

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

GEORGE ENCARNACION

JONATHAN PEREZ-PAYANO

AND

NELFY ULERIO

on or about July 1, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, fentanyl, a schedule II narcotic drug, in a quantity of one ounce or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(4) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

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

GEORGE ENCARNACION

JONATHAN PEREZ-PAYANO

AND

NELFY ULERIO

on or about July 1, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin and/or fentanyl, in violation of N.J.S.A. 2C:35-5(a), while within 1,000 feet of the Grove Street School, which is owned by or leased to the Newark 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 THIRTY-SEVEN

(Possession of a Firearm While Committing Certain Drug Offenses
- Second Degree)

GEORGE ENCARNACION

JONATHAN PEREZ-PAYANO

AND

NELFY ULERIO

on or about July 1, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did possess a firearm, that is a Black Glock, Model 30 semi-automatic handgun, bearing serial RHX492, 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:39-4.1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT THIRTY-EIGHT

(Possession of a Large Capacity Magazine - Fourth Degree)

GEORGE ENCARNACION

JONATHAN PEREZ-PAYANO

AND

NELFY ULERIO

on or about July 1, 2019, in the City of Newark, in the County of Essex, 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:39-3j and N.J.S.A.2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

GEORGE ENCARNACION

on or about July 1, 2019, at the City of Newark, in the County of Essex, 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 FORTY

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

GEORGE ENCARNACION

on or about July 1, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-ONE

(Money Laundering - Second Degree)

GEORGE ENCARNACION

on or about July 1, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, approximately \$144,485 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25a, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

(Money Laundering - Third Degree)

JONATHAN PEREZ-PAYANO

AND

STEFFANY CASTILLO-CANDALARI

on or about July 1, 2019, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, approximately \$28,500 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

LEE HUDSON

on or about July 1, 2019, at the City of East Orange, in the County of Essex, 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 FORTY-FOUR

(Witness Tampering - Second Degree)

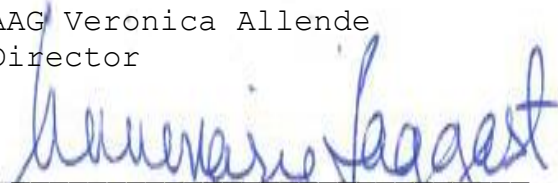
GEORGE ENCARNACION

AND

JONATHAN PEREZ-PAYANO

on or about July 6, 2019, in the city of Newark, County of Essex, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, knowingly did attempt to induce or otherwise cause a witness to testify/inform falsely and/or withhold testimony/information by the employment of force, contrary to the provisions of N.J.S.A. 2C:28-5(a)(1) and/or (2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

AAG Veronica Allende
Director


AAG Anmarie Taggart
Deputy Director
Division of Criminal Justice

A TRUE BILL:



Deputy Foreperson

Dated: 5/25/2021