

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL
State Grand Jury
Number SGJ762-21-5
Superior Court
Docket Number 21-10-158-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

ERIC POLANCO)

JOSEPH LANDRAU)

ROBERTO SANTIAGO)

JAMES ARTUYO)

SAMUEL MIRANDA)

ARLINGTON SANTOS-MEDINA)

ADRIAN EYZAGUIRRE)

JUSSY GERALDINO)

KREMLIN ALCANTARA)

GREGORY POLANCO)

AVI MUNOZ)

ELVIN MUNOZ)

HIPOLITO GUZMAN)

MIKE MARTINEZ)

ROBERT SANTIAGO)

YAHAIRA MANGUAL)

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

COUNT ONE

(Racketeering - First Degree)

ERIC POLANCO

JOSEPH LANDRAU

ROBERTO SANTIAGO

JAMES ARTUYO

SAMUEL MIRANDA

ARLINGTON SANTOS-MEDINA

ADRIAN EYZAGUIRRE

JUSSY GERALDINO

KREEMLIN ALCANTARA

GREGORY POLANCO

AVI MUNOZ

ELVIN MUNOZ

HIPOLITO GUZMAN

MIKE MARTINEZ

AND

ROBERT SANTIAGO

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 an enterprise engaged in or the activities of which affected trade or commerce, in that they:

1. Purposely or knowingly did conduct or participate directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, including the commission of crimes involving the use of firearms, in violation of N.J.S.A. 2C:41-2c; or
2. With the purpose of promoting or facilitating the commission of the crime of racketeering, did agree that:
 - A. One or more of them would engage in conduct which would constitute the crime of racketeering; or
 - B. One or more of them would aid in the planning solicitation or commission of the crime of racketeering, that is to conduct or participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, including the commission of crimes involving the use of firearms, in violation of 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 December 1, 2020, and July 15, 2021, at the City of Paterson, in

the County of Passaic, in the State of New Jersey, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

ERIC POLANCO, JOSEPH LANDRAU, SAMUEL MIRANDA, ARLINGTON SANTOS-MEDINA, ADRIAN EYZAGUIRRE, JUSSY GERALDINO, KREEMLIN ALCANTARA, GREGORY POLANCO, AVI MUNOZ, ELVIN MUNOZ, HIPOLITO GUZMAN, MIKE MARTINEZ, JAMES ARTUYO, ROBERTO SANTIAGO, ROBERT SANTIAGO and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators and members or associates 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, or associates thereof, which, operate in the area of Park Avenue in Paterson and is known to some as the "400 Block" set, engaged in, or the activities of which affected trade or commerce.

THE PURPOSES OF THE ENTERPRISE

At all times relevant to this Indictment, the 400 Block Set was a criminal enterprise operating out of Paterson, New Jersey. The 400 Block Set constitutes an ongoing criminal enterprise whose members and associates function as a continuing unit for the common purpose of achieving the objectives of the enterprise. It was part of the conspiracy that the purposes of the enterprise would include the following:

A. Collectively generating income on behalf of and for the

benefit of members of the enterprise through violations of the law of the State of New Jersey, including the commission of the crimes of distribution of controlled dangerous substances;

- B. Accomplishing the goals of the enterprise through the collection of proceeds generated through the commission of various crimes from members of the enterprise, said proceeds to be utilized for the advancement and benefit of the enterprise and/or its leaders;
- C. Protecting the perpetuation of the enterprise by shielding its operation from detection by law enforcement authorities by, among other things, concealing the means and locations from which it conducts its affairs, 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 that members and associates of the enterprise bought and sold, and to conceal the profits derived from these activities.
- D. Obtaining and storing Community guns to be used among the enterprise members to carry while distributing controlled dangerous substances, for protection from rival gangs and to use against anyone deemed to be a threat to the enterprise.

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 Maintaining or Operating a Controlled Dangerous Substance Facility (N.J.S.A. 2C:35-4); Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5); Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5); Distribution of a Controlled Dangerous Substance within 1,000 feet of School Property (N.J.S.A. 2C:35-7); Possession with Intent to Distribute a Controlled Dangerous Substance within 1,000 feet of School Property (N.J.S.A. 2C:35-7); Possession of a Firearm for an Unlawful Purpose (N.J.S.A. 2C:39-4); Unlawful Transfer of a Firearm (N.J.S.A. 2C:39-9); Financial Facilitation of Criminal Activity (N.J.S.A. 2C:21-25); and Conspiracy to commit these crimes, as described herein and in Counts Two, Four, Five, Six, Seven, Eight, Nine, Ten, Eleven, Twelve, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty, Twenty-One, Twenty-Three, Twenty-Four, Twenty-Five, Twenty-Six, Twenty-Seven, Twenty-Eight, Twenty-Nine, Thirty, Thirty-One, Thirty-Two, Thirty-Three, Thirty-Four, Thirty-Five, Thirty-Six, Thirty-Eight, Thirty-Nine, Forty, Forty-Two, Forty-Three, Forty-Six, Forty-Eight, Fifty-Two, Fifty-Four, Fifty-Six, Fifty-Seven, Fifty-Eight, Sixty,

Sixty-One, Sixty-Five, Sixty-Six, Sixty-Seven, Sixty-Nine, Seventy, Seventy-One, Seventy-Two, Seventy-Four, Seventy-Five, and Seventy-Six of this Indictment.

ERIC POLANCO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; Possession with Intent to Distribute a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance within 1000 feet of School Property; Possession of a Firearm for an Unlawful Purpose; Unlawful Transfer of a Firearm; which racketeering conduct is the subject of Counts Two, Seven, Eight, Nine, Sixteen, Seventeen, Thirty-Six, Thirty-Nine, Forty, Forty-Eight, Sixty-Nine, Seventy, and Seventy-One of this Indictment.

JOSEPH LANDRAU

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance; Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; Possession with Intent to Distribute a Controlled Dangerous Substance within 1000 feet of School Property; Financial

Facilitation of Criminal Activity; and Possession of a Firearm for an Unlawful Purpose; which racketeering conduct is the subject of Counts Two, Fourteen, Fifteen, Twenty, Twenty-One, Thirty-Six, Forty, Forty-Two, Forty-Three, and Forty-Six of this Indictment.

SAMUEL MIRANDA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; which racketeering conduct is the subject of Counts Two, Seven, Eight, Nine, Ten and Eleven of this Indictment.

ARLINGTON SANTOS-MEDINA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance; Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; Possession with Intent to Distribute a Controlled Dangerous Substance within 1000 feet of School Property; and Financial Facilitation of Criminal Activity; which racketeering conduct is the subject of Counts Two, Four, Five, Six, Seventy-Four, Seventy-Five, and Seventy-Six of this Indictment.

ADRIAN EYZAGUIRRE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; which racketeering conduct is the subject of Count Two of this Indictment.

JUSSY GERALDINO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; Possession with Intent to Distribute a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance within 1000 feet of School Property; and Financial Facilitation; which racketeering conduct is the subject of Counts Two, Twenty-Three, Twenty-Four, Twenty-Five, Twenty-Nine and Thirty of this Indictment.

KREMLIN ALCANTARA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; which racketeering conduct is the subject of Counts Two, Twelve, Thirteen, Thirty-One, Thirty-Two and Thirty-Three of this Indictment.

GREGORY POLANCO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; Possession of a Firearm for an Unlawful Purpose; which racketeering conduct is the subject of Counts Two, Thirty-Six and Thirty-Eight of this Indictment.

AVI MUNOZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; which racketeering conduct is the subject of Counts Two, Twenty-Six, Twenty-Seven and Twenty-Eight of this Indictment.

ELVIN MUNOZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; which racketeering conduct is the subject of Count Two of this Indictment.

HIPOLITO GUZMAN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; and Financial Facilitation; which racketeering conduct is the subject of Counts Two and Seventy-Two of this Indictment.

MIKE MARTINEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; and Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; which racketeering conduct is the subject of Counts Two, Eighteen and Nineteen of this Indictment.

JAMES ARTUYO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance; Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; and Possession with Intent to Distribute a Controlled Dangerous Substance within 1000 feet of School Property; which racketeering conduct is the subject of Counts Two, Thirty-One, Thirty-Two, Thirty-Three, Thirty-Four, Thirty-Five, Sixty and Sixty-One of this Indictment.

ROBERTO SANTIAGO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance; Distribution of a Controlled Dangerous Substance within 1000 feet of School Property; Possession with Intent to Distribute a Controlled Dangerous

Substance within 1000 feet of School Property; and Financial Facilitation; which racketeering conduct is the subject of Counts Two, Thirty-One, Thirty-Two, Thirty-Three, Thirty-Four, Thirty-Five, Sixty, Sixty-One, Sixty-Five, Sixty-Six and Sixty-Seven of this Indictment.

ROBERT SANTIAGO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Maintaining or Operating a Controlled Dangerous Substance Production Facility; Distribution of a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance; Possession with Intent to Distribute a Controlled Dangerous Substance within 1000 feet of School Property; and Financial Facilitation; which racketeering conduct is the subject of Counts Two, Fifty-Two, Fifty-Four, Fifty-Six, Fifty-Seven and Fifty-Eight 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)

ERIC POLANCO

JOSEPH LANDRAU

ROBERTO SANTIAGO

JAMES ARTUYO

SAMUEL MIRANDA

ARLINGTON SANTOS-MEDINA

ADRIAN EYZAGUIRRE

JUSSY GERALDINO

KREEMLIN ALCANTARA

GREGORY POLANCO

AVI MUNOZ

ELVIN MUNOZ

HIPOLITO GUZMAN

MIKE MARTINEZ

ROBERT SANTIAGO

AND

YAHAIRA MANGUAL

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 December 1, 2020, and on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and

within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Maintaining or Operating a Controlled Dangerous Substance Facility and Distribution of a Controlled Dangerous Substance, 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. Knowingly did maintain or operate or knowingly did participate in the maintenance or operation of a premises, place or facility used for manufacturing a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-4.

2. Knowingly or purposely distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), and N.J.S.A. 2C:35-5b(3).

3. 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:35-5a(1), N.J.S.A. 2C:35-5b(1), and N.J.S.A. 2C:35-5c.

4. Knowingly or purposely distribute a controlled dangerous substance, that is, oxycodone, a schedule II narcotic

drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5) .

5. Knowingly or purposely distribute a controlled dangerous substance, that is, alprazolam, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(13) .

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

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

(Promoting Organized Street Crime - First Degree)

ERIC POLANCO

JOSEPH LANDRAU

AND

ROBERTO SANTIAGO

between on or about December 1, 2020, and on or about July 15, 2021, at the city of Paterson, in the County of Passaic, 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 FOUR

(Distribution of a Controlled Dangerous Substance - Third Degree)

ARLINGTON SANTOS-MEDINA

on or about March 25, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, oxycodone, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

ARLINGTON SANTOS-MEDINA

on or about March 25, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, alprazolam, a schedule IV controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(13), and against the peace of this State, the government and dignity of the same.

COUNT SIX

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

ARLINGTON SANTOS-MEDINA

on or about March 25, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, oxycodone and/or alprazolam, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Eastside High School, the new Roberto Clemente School and/or St. Joseph's School, which is owned by or leased to the Paterson 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 SEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

SAMUEL MIRANDA

AND

ERIC POLANCO

on or about March 25, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Distribution of a Controlled Dangerous Substance - Third Degree)

SAMUEL MIRANDA

AND

ERIC POLANCO

on or about March 25, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, 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 NINE

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

SAMUEL MIRANDA

AND

ERIC POLANCO

on or about March 25, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, heroin and/or cocaine, in
violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of
Eastside High School, the new Roberto Clemente School and/or St.
Joseph's School, which is owned by or leased to the Paterson
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 TEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

SAMUEL MIRANDA

on or about March 25, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

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

SAMUEL MIRANDA

on or about March 25, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, cocaine, in violation of N.J.S.A.
2C:35-5a, while within 1,000 feet of Eastside High School, the
new Roberto Clemente School and/or St. Joseph's School, which is
owned by or leased to the Paterson 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 TWELVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

KREEMLIN ALCANTARA

on or about April 8, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, oxycodone, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

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

KREEMLIN ALCANTARA

on or about April 8, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, oxycodone, in violation of
N.J.S.A. 2C:35-5a, while within 1,000 feet of Eastside High
School, the new Roberto Clemente School and/or St. Joseph's
School, which is owned by or leased to the Paterson 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 FOURTEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

JOSEPH LANDRAU

between on or about April 15, 2021, and on or about April 22, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, oxycodone, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

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

JOSEPH LANDRAU

between on or about April 15, 2021, and on or about April 22,
2021, at the City of Paterson, in the County of Passaic,
elsewhere, and within the jurisdiction of this Court, knowingly
or purposely did distribute a controlled dangerous substance,
that is, Oxycodone, in violation of N.J.S.A. 2C:35-5a, while
within 1,000 feet of Eastside High School, the new Roberto
Clemente School and/or St. Joseph's School, which is owned by or
leased to the Paterson 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 SIXTEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

ERIC POLANCO

on or about April 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

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

ERIC POLANCO

on or about April 15, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, cocaine, in violation of N.J.S.A.
2C:35-5a, while within 1,000 feet of Eastside High School, the
new Roberto Clemente School and/or St. Joseph's School, which is
owned by or leased to the Paterson 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 EIGHTEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

MIKE MARTINEZ

on or about April 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

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

MIKE MARTINEZ

on or about April 15, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, heroin, in violation of N.J.S.A.
2C:35-5a, while within 1,000 feet of Eastside High School, the
new Roberto Clemente School and/or St. Joseph's School, which is
owned by or leased to the Paterson 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 TWENTY

(Distribution of a Controlled Dangerous Substance - Third Degree)

JOSEPH LANDRAU

on or about April 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, oxycodone, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

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

JOSEPH LANDRAU

on or about April 15, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, oxycodone, in violation of
N.J.S.A. 2C:35-5a, while within 1,000 feet of Eastside High
School, the new Roberto Clemente School and/or St. Joseph's
School, which is owned by or leased to the Paterson 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 TWENTY-TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

JUSSY GERALDINO

on or about June 3, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, oxycodone, 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 TWENTY-THREE

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

JUSSY GERALDINO

on or about June 3, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, oxycodone, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), 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 on or within 1,000 feet of School Property - Third Degree)

JUSSY GERALDINO

on or about June 3, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possession with intent to distribute a controlled dangerous substance, that is, oxycodone, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Eastside High School, the new Roberto Clemente School and/or St. Joseph's School, which is owned by or leased to the Paterson 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 TWENTY-FIVE

(Money Laundering - Third Degree)

JUSSY GERALDINO

on or about June 3, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, the said JUSSY GERALDINO did possess approximately \$1,105 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25(a), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SIX

(Distribution of a Controlled Dangerous Substance - Third Degree)

AVI MUNOZ

on or about June 8, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did 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) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

AVI MUNOZ

between on or about June 8, 2021, and on or about June 30, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, oxycodone, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

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

AVI MUNOZ

between on or about June 8, 2021, and on or about June 30, 2021,
at the City of Paterson, in the County of Passaic, elsewhere,
and within the jurisdiction of this Court, knowingly or
purposely did distribute a controlled dangerous substance, that
is, fentanyl and/or oxycodone, in violation of N.J.S.A. 2C:35-
5a, while within 1,000 feet of Eastside High School, the new
Roberto Clemente School and/or St. Joseph's School, which is
owned by or leased to the Paterson 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 TWENTY-NINE

(Distribution of a Controlled Dangerous Substance - Third Degree)

JUSSY GERALDINO

on or about July 6, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, oxycodone, a schedule II narcotic drug, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(5), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

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

JUSSY GERALDINO

on or about July 6, 2021, at the City of Paterson, in the County
of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, oxycodone, in violation of
N.J.S.A. 2C:35-5a, while within 1,000 feet of Eastside High
School, the new Roberto Clemente School and/or St. Joseph's
School, which is owned by or leased to the Paterson 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 THIRTY-ONE

(Distribution of a Controlled Dangerous Substance - Third Degree)

JAMES ARTUYO

ROBERTO SANTIAGO

AND

KREEMLIN ALCANTARA

on or about July 9, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, oxycodone, 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 THIRTY-TWO

(Distribution of a Controlled Dangerous Substance - Third Degree)

JAMES ARTUYO

ROBERTO SANTIAGO

AND

KREEMLIN ALCANTARA

on or about July 9, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, alprazolam, a schedule IV controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(13), 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

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

JAMES ARTUYO

ROBERTO SANTIAGO

AND

KREEMLIN ALCANTARA

on or about July 9, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, oxycodone and/or alprazolam, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Eastside High School, the new Roberto Clemente School and/or St. Joseph's School, which is owned by or leased to the Paterson 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-FOUR

(Distribution of a Controlled Dangerous Substance - Third Degree)

JAMES ARTUYO

AND

ROBERTO SANTIAGO

on or about July 9, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, 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 THIRTY-FIVE

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

JAMES ARTUYO

AND

ROBERTO SANTIAGO

on or about July 9, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Eastside High School, the new Roberto Clemente School and/or St. Joseph's School, which is owned by or leased to the Paterson 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-SIX

(Conspiracy - Second Degree)

ERIC POLANCO

JOSEPH LANDRAU

AND

GREGORY POLANCO

between on or about June 5, 2021, and on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Unlawful Transfer of a Firearm and Possession of a Weapon with an Unlawful Purpose, 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. Knowingly did possess, receive or transfer a community gun, that is, a semi-automatic Smith & Wesson M&P Shield 40 caliber handgun, bearing Serial Number HLL6749, contrary to the provisions of N.J.S.A. 2C:39-4a(2).

2. Knowingly did transport, ship, sell or dispose of a certain weapon, that is, a Smith & Wesson SD40VE handgun, bearing serial number FDC1970, contrary to the provisions of N.J.S.A. 2C:39-9d.

3. knowingly did possess, receive or transfer a community gun, that is, a Smith & Wesson SD40VE handgun, bearing serial number FDC1970, contrary to the provisions of N.J.S.A. 2C:39-4a(2).

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

COUNT THIRTY-SEVEN

(Unlawful Possession of Weapon - Second Degree)

GREGORY POLANCO

on or about June 5, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did knowingly possess a certain weapon, that is, a semi-automatic Smith & Wesson M&P Shield 40 caliber handgun, bearing Serial Number HLL6749, without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-EIGHT

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

GREGORY POLANCO

on or about June 5, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did knowingly possess, receive or transfer a community gun, that is, a 40 caliber Smith & Wesson M&P Shield handgun, bearing serial number HLL6749, contrary to the provisions of N.J.S.A. 2C:39-4a(2), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-NINE

(Unlawful Transfer of a Firearm - Fourth Degree)

ERIC POLANCO

between on or about June 25, 2021, and on or about June 29, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did knowingly transport, ship, sell or dispose of a certain weapon, that is, a Smith & Wesson SD40VE handgun, bearing serial number FDC1970, contrary to the provisions of N.J.S.A. 2C:39-9d, and against the peace of this State, the government and dignity of the same.

COUNT FORTY

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

ERIC POLANCO

AND

JOSEPH LANDRAU

between on or about June 25, 2021, and on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did knowingly possess, receive or transfer a community gun, that is, a Smith & Wesson SD40VE handgun, bearing serial number FDC1970, contrary to the provisions of N.J.S.A. 2C:39-4a(2) 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

(Possession of a Controlled Dangerous Substance - Third Degree)

JOSEPH LANDRAU

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, 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 FORTY-TWO

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

JOSEPH LANDRAU

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, 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 but less than five
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(2), and
against the peace of this State, the government and dignity of
the same.

COUNT FORTY-THREE

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

JOSEPH LANDRAU

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with the intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Alexander Hamilton Academy and/or the Panther Academy, which is owned by or leased to the Paterson 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 FORTY-FOUR

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

JOSEPH LANDRAU

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did knowingly possess a firearm, that is, a Smith & Wesson SD40VE handgun, bearing serial number FDC1970, 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 against the peace of this State, the government and dignity of the same.

COUNT FORTY-FIVE

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

JOSEPH LANDRAU

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, 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
against the peace of this State, the government and dignity of
the same.

COUNT FORTY-SIX

(Money Laundering - Third Degree)

JOSEPH LANDRAU

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, the said JOSEPH LANDRAU did possess approximately \$310 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25(a), and against the peace of this State, the government and dignity of the same.

COUNT FORTY-SEVEN

(Possession of a Controlled Dangerous Substance - Third Degree)

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, 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 FORTY-EIGHT

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

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, 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 but less than five
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(2), and
against the peace of this State, the government and dignity of
the same.

COUNT FORTY-NINE

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

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did knowingly possess a firearm, that is, a .22 caliber Keltec PMR 30 handgun, bearing serial number WXEP49 and/or .380 Glock 42 handgun, bearing serial number ACXH202, 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 against the peace of this State, the government and dignity of the same.

COUNT FIFTY

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

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, 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
against the peace of this State, the government and dignity of
the same.

COUNT FIFTY-ONE

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

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, 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
against the peace of this State, the government and dignity of
the same.

COUNT FIFTY-TWO

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

ROBERT SANTIAGO

AND

YAHAIRA MANGUAL

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly did maintain or operate or knowingly did
participate in the maintenance or operation or knowingly aid,
promote, finance or otherwise participate in the maintenance or
operation of a premises, place, or facility used for
manufacturing a controlled dangerous substance, that is,
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 FIFTY-THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

ROBERT SANTIAGO

AND

YAHAIRA MANGUAL

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-FOUR

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

ROBERT SANTIAGO

AND

YAHAIRA MANGUAL

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, cocaine, contrary to the
provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and
N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT FIFTY-FIVE

(Possession of a Controlled Dangerous Substance - Fourth Degree)

ROBERT SANTIAGO

AND

YAHAIRA MANGUAL

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess marijuana in a quantity of more than six ounces, contrary to the provisions of N.J.S.A. 2C:35-10(a)(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SIX

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

ROBERT SANTIAGO

AND

YAHAIRA MANGUAL

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did possess with intent to
distribute a controlled dangerous substance, that is, marijuana,
in a quantity of one ounce or more but less than five pounds,
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(11)(b),
and N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT FIFTY-SEVEN

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

ROBERT SANTIAGO

AND

YAHAIRA MANGUAL

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with the intent to distribute a controlled dangerous substance, that is, cocaine and/or marijuana, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Eastside High School, the new Roberto Clemente School and/or St. Joseph's School, which is owned by or leased to the Paterson 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 FIFTY-EIGHT

(Money Laundering - Third Degree)

ROBERT SANTIAGO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, the said ROBERT SANTIAGO did possess approximately \$2,055 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25(a), and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

ROBERTO SANTIAGO

AND

JAMES ARTUYO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, 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 SIXTY

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

ROBERTO SANTIAGO

AND

JAMES ARTUYO

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, cocaine, in a quantity of one-half
ounce or more but less than five ounces, 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 SIXTY-ONE

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

ROBERTO SANTIAGO

AND

JAMES ARTUYO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with the intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of School 10, which is owned by or leased to the Paterson 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 SIXTY-TWO

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

ROBERTO SANTIAGO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did knowingly possess a firearm, that is, a 9mm caliber Ruger Security handgun, bearing serial number 384-56708, 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 against the peace of this State, the government and dignity of the same.

COUNT SIXTY-THREE

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

ROBERTO SANTIAGO

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, 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
against the peace of this State, the government and dignity of
the same.

COUNT SIXTY-FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

ROBERTO SANTIAGO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, 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 SIXTY-FIVE

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

ROBERTO SANTIAGO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, in a quantity of one-half ounce or more but less than five 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(2), and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-SIX

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

ROBERTO SANTIAGO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with the intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of School 10, which is owned by or leased to the Paterson 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 SIXTY-SEVEN

(Money Laundering - Third Degree)

ROBERTO SANTIAGO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, the said ROBERTO SANTIAGO did possess approximately \$4,146 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25(a), and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-EIGHT

(Possession of a Controlled Dangerous Substance - Third Degree)

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, 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 SIXTY-NINE

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

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did distribute a controlled
dangerous substance, that is, cocaine, in a quantity of one-half
ounce or more but less than five 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(2), and against the peace of
this State, the government and dignity of the same.

COUNT SEVENTY

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

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of
this Court, knowingly or purposely did possess with intent to
distribute a controlled dangerous substance, that is, marijuana,
in a quantity of one ounce or more but less than five pounds,
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(11) (b),
and against the peace of this State, the government and dignity
of the same.

COUNT SEVENTY-ONE

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

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with the intent to distribute a controlled dangerous substance, that is, cocaine and/or marijuana, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Eastside High School, the new Roberto Clemente School and/or St. Joseph's School, which is owned by or leased to the Paterson 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 SEVENTY-TWO

(Money Laundering - Third Degree)

HIPOLITO GUZMAN

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, the said HIPOLITO GUZMAN did possess approximately \$3,849 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25(a), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-THREE

(Possession of a Controlled Dangerous Substance - Third Degree)

ARLINGTON SANTOS-MEDINA

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, alprazolam, a Schedule IV 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 SEVENTY-FOUR

(Distribution a Controlled Dangerous Substance - Third Degree)

ARLINGTON SANTOS-MEDINA

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, alprazolam, a schedule IV controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(13), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-FIVE

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

ARLINGTON SANTOS-MEDINA

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with the intent to distribute a controlled dangerous substance, that is, alprazolam, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the new Roberto Clemente School, which is owned by or leased to the Paterson 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 SEVENTY-SIX

(Money Laundering - Third Degree)

ARLINGTON SANTOS-MEDINA

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, the said ARLINGTON SANTOS-MEDINA did possess approximately \$940 in U.S. currency, contrary to the provisions of N.J.S.A. 2C:21-25(a), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-SEVEN

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

GREGORY POLANCO

on or about June 5, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crimes of Unlawful Possession of a Handgun on Passaic County Indictment 16-11-08951-I did purchase, own, possess or control a firearm, that is, a 40 caliber Smith & Wesson M&P Shield handgun, bearing serial number HLL6749, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-EIGHT

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

ERIC POLANCO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crimes of Possession with Intent to Distribute and/or Distribution within 1,000 feet of School Property on Passaic County Accusation 14-08-00725-A and/or Aggravated Assault by Pointing a Firearm on Passaic County Indictment 17-04-00407-I did purchase, own, possess or control a firearm, that is, .22 caliber Keltec PMR30 handgun, bearing serial number WXEP49 and/or a .380 Glock 42 handgun, bearing serial number ACXH202, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-NINE

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

JOSEPH LANDRAU

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Possession with Intent to Distribute and/or Distribution within 1,000 feet of School Property on Passaic County Indictment 16-05-00469-I did purchase, own, possess or control a firearm, that is, Smith Wesson SD40VE handgun, bearing serial number FDC1970, contrary to the provisions of N.J.S.A. 2C:39-7b, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY

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

ROBERTO SANTIAGO

on or about July 15, 2021, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Possession with Intent to Distribute and/or Distribution within 1,000 feet of School Property on Passaic County Accusation 14-03-00135-I; and/or Possession with Intent to Distribute and/or Distribution within 1,000 feet of School Property on Passaic County Indictment 09-10-01199-I; and/or Possession with Intent to Distribute and/or Distribution within 1,000 feet of School Property on Passaic County Indictment 10-01-00033-I; and/or Possession with Intent to Distribute and/or Distribution of a Controlled Dangerous Substance on Passaic County Indictment 10-01-00033-I; and/or Possession with Intent to Distribute and/or Distribution within 1,000 feet of School Property on Passaic County Indictment 07-10-01369-I; and/or Possession with Intent to Distribute and/or Distribution of a Controlled Dangerous Substance on Passaic County Indictment 07-10-01369-I; and/or Possession with Intent to Distribute and/or Distribution within 1,000 feet of School Property on Passaic County Accusation 08-04-00394-A; and/or Possession with Intent to Distribute and/or Distribution within 1,000 feet of School Property on Passaic

