

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ754-21-12
Superior Court
Docket Number 21-5-66-S

STATE OF NEW JERSEY)

v.)

PETER SANTOS)

JOSHUA PEREZ)

and)

MARIANA PEREZ)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

PETER SANTOS

and

JOSHUA PEREZ

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Robbery, Aggravated Assault, and Possession of a Weapon for an Unlawful Purpose did agree that:

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

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

1. In the course of committing a theft, knowingly inflict bodily injury upon T.W. and/or threaten immediate bodily injury to T.W. while armed with or threatening the immediate use of a deadly weapon, contrary to N.J.S.A. 2C:15-1.

2. Purposely attempt to cause bodily injury to T.W. with a deadly weapon, contrary to N.J.S.A. 2C:12-1b(2).

3. Knowingly did possess a certain weapon, that is, a .40 caliber Beretta Model PX4 Storm semi-automatic handgun, serial number PY150589, with the purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(1).

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

COUNT TWO

(Robbery - First Degree)

PETER SANTOS

and

JOSHUA PEREZ

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did inflict bodily injury upon T.W. and/or threaten immediate bodily injury to T.W. while armed with or threatening the immediate use of a deadly weapon, contrary to the provisions of N.J.S.A. 2C:15-1, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Aggravated Assault - Third Degree)

PETER SANTOS

and

JOSHUA PEREZ

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowing did attempt to cause bodily injury to T.W. with a deadly weapon, contrary to the provisions of N.J.S.A. 2C:12-1b(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Aggravated Assault - Fourth Degree)

PETER SANTOS

and

JOSHUA PEREZ

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did under circumstances manifesting extreme indifference to the value of human life, point a firearm at or in the direction of T.W., contrary to the provisions of N.J.S.A. 2C:12-1b(4), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Unlawful Possession of a Weapon - Second Degree)

PETER SANTOS

and

JOSHUA PEREZ

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .40 caliber Beretta Model PX4 Storm semi-automatic handgun, serial number PY150589, without having first 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, 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 Weapon for an Unlawful Purpose - Second Degree)

PETER SANTOS

and

JOSHUA PEREZ

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a .40 caliber Beretta Model PX4 Storm semi-automatic handgun, serial number PY150589, with purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a, 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 Hollow Nose Bullets - Fourth Degree)

PETER SANTOS

and

JOSHUA PEREZ

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon or device, that is hollow nose bullets, contrary to the provisions of N.J.S.A. 2C:39-3f, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

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

PETER SANTOS

and

JOSHUA PEREZ

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, 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 NINE

(Resisting Arrest By Flight - Fourth Degree)

PETER SANTOS

and

JOSHUA PEREZ

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did prevent Detective Richard Agabiti, a law enforcement officer of the Trenton Police Department, from effecting a lawful arrest, by flight, contrary to N.J.S.A. 2C:29-2a(2), and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Unlawful Possession of a Weapon - Second Degree)

JOSHUA PEREZ

between on or about January 9, 2021, and on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .22 caliber Ruger Model LCR revolver, serial number 548-35298, without having first 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 ELEVEN

(Tampering with Physical Evidence - Fourth Degree)

PETER SANTOS

on or about January 24, 2021, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, believing that an official investigation was pending or about to be instituted, knowingly did alter, destroy, conceal, or remove any article, object, record, document, or other thing of physical substance, that is, a handgun, with the purpose to impair its verity or availability in such proceeding or investigation, contrary to N.J.S.A. 2C:28-6a(1), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Possession of a Controlled Dangerous Substance- Third Degree)

PETER SANTOS

on or about January 25, 2021, at the City of Trenton, in the County of Mercer, 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 THIRTEEN

(Hindering Apprehension or Prosecution of
Another Person - Third Degree)

MARIANA PEREZ

between on or about January 24, 2021, and on or about January 25, 2021, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose to hinder the apprehension, prosecution, conviction, or punishment of another person, that is, Peter Santos, provided or aided in providing a weapon, money, transportation, disguise, or other means of avoiding discovery or apprehension or effecting escape, and/or did warn Peter Santos of impending discovery or apprehension, contrary to the provisions of N.J.S.A. 2C:29-3a(2), N.J.S.A. 2C:29-3a(4), and against the peace of this State, government and dignity of the same.

AAG Veronica Allende
Director

BY:


AAG Anmarie Taggart
Division of Criminal Justice

A TRUE BILL:


Foreperson

Date: 5/10/21