

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ754-21-13  
Superior Court  
Docket Number 21-5-65-S

STATE OF NEW JERSEY )  
 )  
 v. ) INDICTMENT  
 )  
 WILLIAM WOOLLEY )  
 )  
 ANDRE SULIMENKO )  
 )  
 and )  
 )  
 NICHOLAS GOOSKOS )

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

COUNT ONE

(Conspiracy - Third Degree)

WILLIAM WOOLLEY  
ANDRE SULIMENKO  
and  
NICHOLAS GOOSKOS

between on or about November 1, 2020, and on or about December 3, 2020, at the Township of Jackson, in the County of Ocean, at the Township of Spring Lake Heights, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, with the

purpose of promoting or facilitating the commission of the crime of Distribution of an Imitation Controlled Dangerous Substance, did agree together, that:

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

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

A. Knowingly distribute a substance, not a controlled dangerous substance, upon the express or implied representation that the substance was a controlled dangerous substance, and/or under circumstances which would lead a reasonable person to believe the substance was a controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-11a.

OVERT ACTS

In pursuance of the said conspiracy, the following OVERT ACTS, among others were committed:

1. Between on or about November 1, 2020, and on or about December 2, 2020, NICHOLAS GOOSKOS agreed to provide, and did provide, approximately one kilogram of imitation controlled dangerous substance to WILLIAM WOOLLEY, believing that it contained a controlled dangerous substance, and knowing that Woolley would provide it to ANDRE SULIMENKO to exchange for profit, which would be split between WILLIAM WOOLLEY, ANDRE SULIMENKO, and

NICHOLAS GOOSKOS.

2. On or about December 2, 2020, in Jackson Township, New Jersey, WILLIAM WOOLLEY agreed to provide, and did provide, the approximately one kilogram of imitation controlled dangerous substance to ANDRE SULIMENKO, believing that the kilogram contained a controlled dangerous substance.

3. On or about December 2, 2020, ANDRE SULIMENKO transported the imitation controlled dangerous substance in Jackson, New Jersey, with the intent to distribute it to another person.

4. Between on or about November 1, 2020, and December 2, 2020, WILLIAM WOOLLEY, ANDRE SULIMENKO, and NICHOLAS GOOSKOS agreed that they would distribute a second kilogram of imitation controlled dangerous substance in the same manner, with NICHOLAS GOOSKOS providing the second kilogram to WILLIAM WOOLLEY to provide to ANDRE SULIMENKO to distribute to another person, believing that the kilogram contained a controlled dangerous substance.

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

COUNT TWO

(Possession with the Intent to Distribute an Imitation  
Controlled Dangerous Substance - Third Degree)

WILLIAM WOOLLEY

ANDRE SULIMENKO

and

NICHOLAS GOOSKOS

between on or about November 1, 2020, and on or about December 3, 2020, at the Township of Jackson, in the County of Ocean, at the Township of Spring Lake Heights, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly did possess with the intent to distribute a substance, not a controlled dangerous substance, upon the express or implied representation that the substance was a controlled dangerous substance, and/or under circumstances which would lead a reasonable person to believe the substance was a controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-11a, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

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

WILLIAM WOOLLEY

on or about December 2, 2020, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a .45 Auto caliber Hi-Point semi-automatic pistol, serial number X4120010; and/or a .380 Auto caliber Bryco Arms semi-automatic pistol, serial number 1470392; and/or a .22 Long Rifle caliber Beretta semi-automatic pistol, serial number BCS31778U; and/or a .32 Auto caliber Colt semi-automatic pistol, serial number 32754; and/or a 10mm Luger caliber Smith and Wesson semi-automatic pistol, serial number TFD8725; and/or a .223 caliber Ruger semi-automatic rifle, serial number 18205835; and/or a 7.62x39mm caliber semi-automatic rifle, identification number NJ200008A; and/or a 7.62x39mm caliber Yugoslavian semi-automatic rifle, serial number M486132; and/or a .223 caliber Sonju Industrial Defense semi-automatic rifle, serial number SI0000886; and/or a 7.62x39mm caliber Nodak Spud semi-automatic rifle, serial number M007361; and/or a 7.62x39mm caliber semi-automatic rifle, identification number NJ200008; and/or a .38 Special caliber Smith and Wesson revolver, serial number D184141; and/or a .22 Magnum caliber Ruger revolver, serial number 816602;

and/or a .44 Magnum caliber Ruger revolver, serial number 8614586;  
and/or a .44 caliber Ruger revolver, serial number 14027882; and/or  
a .38 Special Excam two-barrel pistol, serial number L47579; and/or  
a .32 caliber Davis Industries two-barrel pistol, serial number  
444818; and/or a .22 Long Rifle caliber Davis Industries two-  
barrel pistol, serial number 279438; and/or a .22 Long Rifle  
caliber Italian EIG two-barrel pistol, serial number 48858; and/or  
a .22 Long Rifle caliber Remington pump action rifle, serial number  
69256; and/or a 12 gauge Savage double-barrel SxS shotgun; and/or  
an 8mm Mauser caliber Yugoslavian bolt action rifle, serial number  
D2160; and/or a 12 gauge Harrington & Richardson single-barrel  
shotgun, serial number A712042; and/or a .22 Long Rifle caliber  
Precision Industries pump action rifle, serial number C000796;  
and/or a .22 Long Rifle caliber Marlin bolt action rifle; and/or  
a 7.62x54R caliber Izhevsk bolt action rifle, serial number R03565;  
and/or a 303 British caliber Savage bolt action rifle, serial  
number 24C1165; and/or a 30-30 caliber Winchester lever action  
rifle, serial number 2881361; and/or a .22 Long Rifle caliber  
Marlin lever action rifle, serial number Y8634; and/or a 12 gauge  
High Standard pump action shotgun; and/or a 12 gauge Remington  
semi-automatic shotgun, serial number PC309132; and/or a 20 gauge  
Sarasqueta Stoeger Arms double-barrel shotgun, serial number  
187821; and/or a 410 Bore Iver Johnson single-barrel shotgun,

serial number E4173;, and/or a 303 caliber Golden State Arms bolt action rifle, serial number U13595; and/or a .17 HMR caliber CBC Mossberg bolt action rifle, serial number HHA025798; and/or a .22 Magnum caliber Marlin Sears bolt action rifle; and/or a 4.5/177 caliber Diana spring or air pistol, serial number 19152; and/or a 177 caliber Daisy spring or air rifle, lot number L909164, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-11a, contrary to the provisions of N.J.S.A. 2C:39-4.1a, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Unlawful Possession of a Machine Gun - Second Degree)

WILLIAM WOOLLEY

on or about December 2, 2020, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession a machine gun or an instrument or device adaptable for use as a machine gun, that is, a Thompson Submachine gun upper receiver, serial number 631132; and/or various Thomas Submachine gun parts, without being licensed to do so as provided in N.J.S.A. 2C:58-5, contrary to the provisions of N.J.S.A. 2C:39-5a, and against the peace of this State, the government and dignity of the same.



COUNT FIVE

(Unlawful Possession of an Assault Firearm - Second Degree)

WILLIAM WOOLLEY

on or about December 2, 2020, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, a 7.62 x 39mm caliber Nodak Spud semi-automatic rifle, serial number M007361; and/or a 7.62 x 39mm caliber semi-automatic rifle, identification number NJ200008A, contrary to the provisions of N.J.S.A. 2C:39-5f, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Manufacture, Transport, Disposition of  
a Weapon - Fourth Degree)

WILLIAM WOOLLEY

between on or about November 1, 2020, and on or about December 2, 2020, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did manufacture or cause to be manufactured a weapon, that is, a 7.62 x 39mm caliber semi-automatic rifle, identification number NJ200008, without having been registered or licensed to do so as provided in Chapter 58, 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 SEVEN

(Unlawful Possession of a Firearm without a  
Serial Number - Third Degree)

WILLIAM WOOLLEY

on or about December 2, 2020, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm manufactured or otherwise assembled using a firearm frame or firearm receiver, as defined in N.J.S.A. 2C:39-9k, which was not imprinted with a serial number registered with a federally licenses manufacturer, that is, a 7.62 x 39mm caliber semi-automatic rifle, identification number NJ200008, contrary to the provisions of N.J.S.A. 2C:39-3n, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Purchasing or Obtaining Firearm Parts to Manufacture  
a Firearm without a Serial Number - Third Degree)

WILLIAM WOOLLEY

on or about December 2, 2020, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, purposely manufactured or otherwise assembled an untraceable firearm, that is, a 7.62 x 39mm caliber semi-automatic rifle, identification number NJ200008; and/or a 7.62 x 39mm caliber semi-automatic rifle, identification number NJ200008A; and/or a .45 caliber or .410 bore Leinad type two-barrel SxS pistol, identification number NJ200008B; and/or a .45 caliber or .410 bore Leinad type two-barrel SxS pistol, identification number NJ200008C; and/or a .45 caliber or .410 bore Leinad type two-barrel over under pistol, identification number NJ200008D, without having been licensed or registered to do so as provided in Chapter 58, by purchasing separately or as a kit any combination of parts from which a firearm without a serial number may be readily assembled, but which does not have the capacity to function as a firearm unless manufactured or otherwise assembled, contrary to the provisions of N.J.S.A. 2C:39-9k, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Unlawful Possession of Large Capacity  
Ammunition Magazines - Fourth Degree)

WILLIAM WOOLLEY

on or about December 2, 2020, at the Township of Jackson, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, knowingly did possess large capacity ammunition magazines, 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 TEN

(Possession of a Controlled Dangerous Substance - Third Degree)

NICHOLAS GOOSKOS

on or about December 3, 2020, at the City of Neptune, in the County of Monmouth, 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 ELEVEN

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

NICHOLAS GOOSKOS

on or about December 3, 2020, at the Township of Spring Lake Heights, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a 7.62x39mm caliber Izhmash Saiga semi-automatic rifle, serial number 13400802; and/or a 16 gauge French double-barrel SxS shotgun, serial number 53554; and/or a .22 Long Rifle caliber Remington semi-automatic rifle, serial number A1860615; and/or a 12 gauge Mossberg pump action shotgun, serial number P465439; and/or a 7.62x54R caliber Izhevsk bolt action rifle, serial number GM699; and/or a 8mm Mauser caliber Yugoslavian bolt action rifle, serial number FS111; while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-11, contrary to the provisions of N.J.S.A. 2C:39-4.1a, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Unlawful Possession of an Assault Firearm - Second Degree)

NICHOLAS GOOSKOS

on or about December 3, 2020, at the Township of Spring Lake Heights, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly did have in his possession an assault firearm, that is, a 7.62x39mm caliber Inter Ordnance semi-automatic rifle, serial number S025667, contrary to the provisions of N.J.S.A. 2C:39-5f, and against the peace of this State, the government and dignity of the same.



COUNT THIRTEEN

(Unlawful Possession of Large Capacity  
Ammunition Magazines - Fourth Degree)

NICHOLAS GOOSKOS

on or about December 3, 2020, at the Township of Spring Lake Heights, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, knowingly did possess large capacity ammunition magazines, 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.

AAG Veronica Allende  
Director  
Division of Criminal Justice

*s/Cassandra Montalto*  
By: SDAG Cassandra Montalto  
Deputy Chief  
Division of Criminal Justice

A TRUE BILL:

  
Foreperson

Date: 5-10-21 \_\_\_\_\_