

**FILED**

JUL 12 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ636-13-17

Superior Court

Docket Number 13-07-00126-S

STATE OF NEW JERSEY )  
v. )  
SEGUNDO GARCIA )  
also known as )  
MORENO )  
WILFREDO MOREL )  
also known as )  
CRISTINO MOREL )  
CARLOS GOMEZ )  
MALCOLM HAYNES )  
RIGOBERTO PEREZ )  
BRAULIO MINAYA )  
ALVIN ALBA )  
RANDOLPH BRETON )  
LEONARDO FLORES )  
WENDY HERNANDEZ TAVERAZ )  
MANUEL ALMONTE )  
RAMONA ALMONTE GONZALEZ )  
ROBIN VARGAS )  
CHRISTOPHER COX )  
and )  
FRANCHOT KEELING )  
)

INDICTMENT

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

COUNT ONE

(Racketeering - First Degree)

SEGUNDO GARCIA

WILFREDO MOREL

CARLOS GOMEZ

MALCOLM HAYNES

RIGOBERTO PEREZ

BRAULIO MINAYA

ALVIN ALBA

RANDOLPH BRETON

LEONARDO FLORES

WENDY HERNANDEZ TAVERAZ

MANUEL ALMONTE

RAMONA ALMONTE GONZALEZ

ROBIN VARGAS

CHRISTOPHER COX

and

FRANCHOT KEELING

who are named as the defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, some

of whom are named as co-conspirators and members of the criminal 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 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, 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

1. The predicate criminal activity occurred between in or about April 2012, and on or about November 12, 2012.

#### THE RELEVANT PLACES

2. The predicate criminal activity took place at the City of Paterson, at the Boro of Prospect Park, both in the County of Passaic, at the City of Jersey City, in the County of Hudson, in the State of New York, elsewhere, and within the jurisdiction of this Court.

#### THE ENTERPRISE

3. SEGUNDO GARCIA, WILFREDO MOREL, CARLOS GOMEZ, MALCOLM HAYNES, RIGOBERTO PEREZ, BRAULIO MINAYA, ALVIN ALBA, RANDOLPH BRETON, LEONARDO FLORES, WENDY HERNANDEZ TAVERAZ, MANUEL ALMONTE, RAMONA ALMONTE GONZALEZ, ROBIN VARGAS, CHRISTOPHER COX, AND

FRANCHOT KEELING all of whom are co-conspirators, and other persons whose identities are both known and unknown to the State Grand Jurors, would 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, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise would include the unlawful manufacture and distribution of controlled dangerous substances in exchange for United States Currency accomplished as follows. The enterprise had a leadership that financed, organized, supervised, and managed the subordinate members in a common course of conduct to manufacture, distribute, and transport within and without this State, controlled dangerous substances, that is, heroin, classified in Schedule I. The enterprise consisted of a number of "packagers" who would manufacture and package the heroin for distribution on a routine and almost daily basis. The packagers would transport the packaged heroin through the use of "drivers," who would transport members of the enterprise, as well as packages believed to consist of U.S. Currency and/or heroin in and around New Jersey. The managers of the enterprise would further distribute the heroin, or direct the further distribution of the heroin by one of the packagers or drivers. The leadership of this enterprise would finance and direct the manufacturing and distribution of heroin, secure

locations to manufacture heroin, obtain large amounts of raw heroin to give to packagers for manufacturing, and pay the packagers and drivers with U.S. Currency. The enterprise also consisted of individuals who stored and transported the profits made from this illicit drug distribution enterprise in order to avoid detection and seizure by law enforcement. Through this artifice, the enterprise manufactured a large amount of heroin which in turn was sold in bulk for United States Currency by the leader and management members of this enterprise to individuals whose identities are known and unknown to the State Grand Jurors.

#### THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A.2C:41-1d, engaged in by members of the enterprise, did consist of at least two incidents of racketeering conduct during the relevant time period stated above, including but not limited to: Leader of Narcotics Trafficking Network (N.J.S.A. 2C:35-3); maintaining or operating a controlled dangerous substance production facility (N.J.S.A. 2C:35-4); distribution and possession with intent to distribute controlled dangerous substances (N.J.S.A. 2C:35-5); possession with intent to distribute controlled dangerous substances within 1,000 feet of school property (N.J.S.A. 2C:35-7); money laundering (N.J.S.A. 2C:21-25) involving U.S. Currency valued in excess of \$75,000 but

less than \$500,000; money laundering (N.J.S.A. 2C:21-25) involving U.S. Currency valued less than \$75,000; and conspiracy to commit the foregoing crimes (N.J.S.A. 2C:5-2), primarily in the following ways:

SEGUNDO GARCIA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of leading a narcotics trafficking network, unlawful maintenance or operation of a controlled dangerous substance production facility, distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, possession with intent to distribute controlled dangerous substances within 1,000 feet of school property, and money laundering, all of which are the subject of Counts 2,3,4,5,6,7,8,14,15,16,17,18, and 19, of this Indictment.

WILFREDO MOREL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, unlawful maintenance or operation of a controlled dangerous substance production facility, possession with the intent to distribute controlled dangerous substances within 1,000 feet of school property, and money laundering, all of which are the subject of Counts 3,4,5,6,14,15, and 16 of this

Indictment.

CARLOS GOMEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of unlawful maintenance or operation of a controlled dangerous substance production facility, distribution of controlled dangerous substances, and possession with the intent to distribute controlled dangerous substances, all of which are the subject of Counts 3, 4, 7, and 8 of this Indictment.

MALCOLM HAYNES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, all of which are the subject of Counts 3, 7, and 8 of this Indictment.

RIGOBERTO PEREZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances and money laundering, all of which are the subject of Counts 3, 15, and 18 of this Indictment.

BRAULIO MINAYA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, unlawful maintenance or operation of a controlled

dangerous substance production facility, possession with the intent to distribute controlled dangerous substances, possession with the intent to distribute controlled dangerous substances within 1,000 feet of a school, all of which are the subject of Counts 3,4,9, and 10 of this Indictment.

ALVIN ALBA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, unlawful maintenance or operation of a controlled dangerous substance production facility, possession with the intent to distribute controlled dangerous substances, possession with the intent to distribute controlled dangerous substances within 1,000 feet of a school, and money laundering, all of which are the subject of Counts 3,4,11,12,15,and 17 of this Indictment.

RANDOLPH BRETON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, possession with the intent to distribute controlled dangerous substances within 1,000 feet of a school, all of which are the subject of Count 3, 5, and 6 of this Indictment.

LEONARDO FLORES

did commit the racketeering conduct by engaging in or conspiring



to commit repeated acts of distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, all of which are the subject of Count 3 of this Indictment.

WENDY HERNANDEZ TAVERAZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, and unlawful maintenance or operation of a controlled dangerous substance production facility, all of which are the subject of Counts 3 and 4 of this Indictment.

MANUEL ALMONTE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, all of which are the subject of Count 3 of this Indictment.

RAMONA ALMONTE GONZALEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances and possession with the intent to distribute a controlled dangerous substance and money laundering, all of which are the subject of Count 3, 15, and 19 of this Indictment.

ROBIN VARGAS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, unlawful maintenance or operation of a controlled dangerous substance production facility, possession with the intent to distribute controlled dangerous substances, all of which are the subject of Counts 3, 4, and 5 of this Indictment.

CHRISTOPHER COX

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, possession of controlled dangerous substances with the intent to distribute, which are the subject of Counts 3 and 8 of this Indictment.

FRANCHOT KEELING

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution of controlled dangerous substances, possession with the intent to distribute controlled dangerous substances, all of which are the subject of Counts 3 and 8 of this Indictment.

All in violation of N.J.S.A. 2C:41-2c, N.J.S.A. 2C:41-2d, and against the peace of this State, the government and dignity of the same.

FORFEITURES

1. All allegations heretofore set forth are hereby incorporated by reference and re-alleged as if fully set forth herein, for the

purpose of alleging forfeitures pursuant to N.J.S.A. 2C:41-3b.

2. The defendants have property constituting interests, including money and other items of value, acquired or maintained, in violation of N.J.S.A. 2C:41-2c, and N.J.S.A. 2C:41-2d.

3. The said interests, all subject to forfeiture to the State of New Jersey, shall expressly include the following:

A. The sum of \$232,866 in U.S. Currency recovered from the premises located at 246 Maryland Avenue, Paterson, New Jersey;

B. The sum of \$30,420 in U.S. Currency recovered from the premises located at 39 East 39<sup>th</sup> Street, Paterson, New Jersey and the 2007 BMW X5 New Jersey Registration 75CMS;

C: The sum of \$3,500 in U.S. Currency recovered from the premises located at 570 River Street, Paterson, New Jersey; and

D. The sum of \$1,200 in U.S. Currency recovered from the premises located at 253 23<sup>rd</sup> Avenue, Paterson, New Jersey.

COUNT TWO

(Leader of Narcotics Trafficking Network - First Degree)

SEGUNDO GARCIA

between in or about April 2012, and on or about November 12, 2012, at the City of Paterson, at the Boro of Prospect Park, both in the County of Passaic, at the City of Jersey City, in the County of Hudson, at the State of New York, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with other individuals, both known and unknown to the Grand Jurors, 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 Schedule I controlled dangerous substances, that is heroin, contrary to the provisions of N.J.S.A. 2C:35-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Conspiracy - Second Degree)

SEGUNDO GARCIA

WILFREDO MOREL

CARLOS GOMEZ

MALCOLM HAYNES

RIGOBERTO PEREZ

BRAULIO MINAYA

ALVIN ALBA

RANDOLPH BRETON

LEONARDO FLORES

WENDY HERNANDEZ TAVERAZ

MANUEL ALMONTE

RAMONA ALMONTE GONZALEZ

CHRISTOPHER COX

FRANCHOT KEELING

and

ROBIN VARGAS

who are named as defendants herein, and other individuals whose identities are both known and unknown to the Grand Jurors, between in or about April 2012, and on or about November 12, 2012, at the City of Paterson, at the Boro of Prospect Park, both in the County of Passaic, at the City of Jersey City, in the County of Hudson, at the State of New York, 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, possession with intent to distribute a controlled dangerous substance, and maintaining or operating a controlled dangerous substance production facility, 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 or purposely distribute a controlled dangerous substance, that is heroin, in the quantity of five ounces or more, including any adulterants and dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(1) and N.J.S.A. 2C:35-5<sup>©</sup>;

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

3. Knowingly or purposely maintain or operate or knowingly participate in the maintenance or operation of any premise, place or facility used for manufacturing a controlled dangerous substance, that is heroin, 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 FOUR  
(Maintaining or Operating a Controlled Dangerous Substance  
Production Facility - First Degree)

SEGUNDO GARCIA

WILFREDO MOREL

CARLOS GOMEZ

BRAULIO MINAYA

ALVIN ALBA

WENDY HERNANDEZ TAVERAZ

and

ROBIN VARGAS

between in or about April 2012, and on or about November 12, 2012, at the City of Paterson, at the Boro of Prospect Park, both in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did maintain or operate or knowingly did aid or promote or finance or otherwise participate in the maintenance or operations of a premise, place or facility used for manufacturing a controlled dangerous substance, that is, heroin, 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 FIVE

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

SEGUNDO GARCIA

WILFREDO MOREL

ROBIN VARGAS

and

RANDOLPH BRETON

on or about November 12, 2012, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess or have under his control with intent to distribute a controlled dangerous substance, that is heroin, in a quantity of five ounces or more including any adulterants and dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(1), N.J.S.A. 2C:35-5<sup>©</sup>) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

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

SEGUNDO GARCIA

WILFREDO MOREL

and

RANDOLPH BRETON

on or about November 12, 2012, 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, heroin, in  
violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of School  
#25, 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 SEVEN

(Distribution of a Controlled Dangerous Substance - First Degree)

SEGUNDO GARCIA

CARLOS GOMEZ

and

MALCOLM HAYNES

on or about October 11, 2012, 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 a quantity of five ounces or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(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 with the Intent to Distribute a Controlled  
Dangerous Substance - First Degree)

SEGUNDO GARCIA

CARLOS GOMEZ

MALCOLM HAYNES

CHRISTOPHER COX

and

FRANCHOT KEELING

on or about October 11, 2012, 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, heroin in a  
quantity of five ounces or more including any adulterants or  
dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1),  
N.J.S.A. 2C:35-5(b)(1), and N.J.S.A. 2C:2-6, and against the  
peace of this State, the government and dignity of the same.

COUNT NINE

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

BRAULIO MINAYA

on or about November 12, 2012, 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 heroin, in a quantity of one-half ounce or more including any adulterants and dilutants, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1), N.J.S.A. 2C:35-5(b)(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

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

BRAULIO MINAYA

on or about November 12, 2012, 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, heroin, in  
violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of School  
#7, 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 ELEVEN

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

ALVIN ALBA

on or about November 12, 2012, 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 anabolic steroids, a Schedule III controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-5(a)(1) and N.J.S.A. 2C:35-5(b)(13), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

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

ALVIN ALBA

on or about November 12, 2012, 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, anabolic steroids, a Schedule III controlled dangerous substance, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of School #26, 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 THIRTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

SEGUNDO GARCIA

WILFREDO MOREL

CARLOS GOMEZ

MALCOLM HAYNES

BRAULIO MINAYA

RANDOLPH BRETON

ROBIN VARGAS

CHRISTOPHER COX

and

FRANCHOT KEELING

between in or about April 2012, and on or about November 12, 2012, at the City of Paterson, in the Boro of Prospect Park, both in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did knowingly or purposely possess a controlled dangerous substance, that is, heroin, a Schedule I narcotic drug, 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 FOURTEEN

(Distribute, Dispense or Possess with the Intent to Distribute  
Drug Paraphernalia - Fourth Degree)

SEGUNDO GARCIA

WILFREDO MOREL

ROBIN VARGAS

and

WENDY HERNANDEZ TAVERAZ

between in or about April 2012, and on or about November 12, 2012, in the City of Paterson, in the County of Passaic, elsewhere and within the jurisdiction of this Court, did knowingly possess with the intent to distribute drug paraphernalia, that is packaging tape, strainers, glassine envelopes, rubber bands, digital scales, coffee grinders, vacuum sealer, blenders, stamps, needles, syringes, and other items used to package controlled dangerous substances, knowing that the items would be used to manufacture, compound, convert, produce, process, prepare, test, analyze, pack, repack, store, contain, conceal, ingest, inhale or otherwise introduce into the human body a controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:36-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Conspiracy - Second Degree)

SEGUNDO GARCIA

WILFREDO MOREL

ALVIN ALBA

RIGOBERTO PEREZ

and

RAMONA ALMONTE GONZALEZ

who are named as defendants herein, and other individuals whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between in or about April 2012, and on or about November 12, 2012, 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 crime of money laundering, 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. To knowingly transport or possess property, including U.S. Currency, or engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, that is the sum of

\$267,986 in U.S. Currency, contrary to the provisions of N.J.S.A.  
2C:21-25a, N.J.S.A. 2C:21-25b and N.J.S.A. 2C:21-27.

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 SIXTEEN

(Money Laundering - Second Degree)

SEGUNDO GARCIA

and

WILFREDO MOREL

on or about November 12, 2012, in the City of Paterson, in the County of Passaic, elsewhere and within the jurisdiction of this Court, knowingly did transport or possess property, in an amount of \$75,000 or more, known or which a reasonable person would believe to be derived from criminal activity, that is, the said SEGUNDO GARCIA and WILFREDO MOREL did transport or possess property, in an amount of approximately \$232,866 in U.S. currency, known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-27, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Money Laundering - Third Degree)

SEGUNDO GARCIA

and

ALVIN ALBA

on or about November 12, 2012, in the City of Paterson, in the County of Passaic, elsewhere and within the jurisdiction of this Court, knowingly did transport or possess property, in an amount less than \$75,000, known or which a reasonable person would believe to be derived from criminal activity, that is, the said SEGUNDO GARCIA and ALVIN ALBA did transport or possess property, in an amount of approximately \$30,420 in U.S. currency, known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-27, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Money Laundering - Third Degree)

SEGUNDO GARCIA

and

RIGOBERTO PEREZ

on or about November 12, 2012, in the City of Paterson, in the County of Passaic, elsewhere and within the jurisdiction of this Court, knowingly did transport or possess property, in an amount less than \$75,000, known or which a reasonable person would believe to be derived from criminal activity, that is, the said SEGUNDO GARCIA and RIGOBERTO PEREZ did transport or possess property, in an amount of approximately \$3,500 in U.S. currency, known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-27, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN


(Money Laundering - Third Degree)

SEGUNDO GARCIA


and

RAMONA ALMONTE GONZALEZ

on or about November 12, 2012, in the City of Paterson, in the County of Passaic, elsewhere and within the jurisdiction of this Court, knowingly did transport or possess property, in an amount less than \$75,000, known or which a reasonable person would believe to be derived from criminal activity, that is, the said SEGUNDO GARCIA and RAMONA ALMONTE GARCIA did transport or possess property, in an amount of approximately \$1,200 in U.S. currency, known or which a reasonable person would believe to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-27, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

  
AAG Elie Honig  
Director  
Division of Criminal Justice

A TRUE BILL:

  
Foreperson

Dated: 7/12/13



**FILED**

JUL 12 2013

**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ636-13-17

Superior Court

Docket Number

13-07-00126-S

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

SEGUNDO GARCIA )  
also known as )  
MORENO )

WILFREDO MOREL )  
also known as )  
CRISTINO MOREL )

CARLOS GOMEZ )

MALCOLM HAYNES )

RIGOBERTO PEREZ )

BRAULIO MINAYA )

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ROBIN VARGAS )

CHRISTOPHER COX )

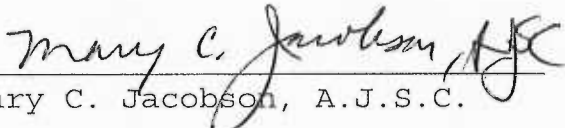
and )

FRANCHOT KEELING )

An Indictment having been returned to this Court by the  
State Grand Jury in the above captioned matter,

IT IS ORDERED on this 12<sup>th</sup> day of July, 2013, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Passaic be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Passaic for filing.

  
Mary C. Jacobson, A.J.S.C.