

FILED

DEC 16 2014
State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ662-14-8
Superior Court
Docket Number 4-12-00187-

STATE OF NEW JERSEY)
v.)
JOSE CORREA)
SANTA LANTIGUA)
ALFRED LANTIGUA DE LA CRUZ)
AND)
SIAMEL PEREZ)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

JOSE CORREA

SANTA LANTIGUA

ALFRED LANTIGUA DE LA CRUZ

AND

SIAMEL PEREZ

on or about February 20, 2014, at the City of Elizabeth, in the County of Union, 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 Production Facility, and/or Possession with Intent to Distribute, and/or 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. Knowingly 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 and/or cocaine, contrary to the provisions of N.J.S.A. 2C:35-4; and/or

2. Knowingly or purposely possess with the intent to distribute a controlled dangerous substance, that is, heroin, and/or 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) and N.J.S.A. 2C:35-5b(1); and/or

3. Knowingly transport or possess property, including U.S. currency, or engage in transactions known to be, or which a reasonable person would believe to be, derived from criminal activity, that is the sum of \$24,070 in U.S. Currency, contrary to the provisions of N.J.S.A. 2C:21-25(a).

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

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

JOSE CORREA

SANTA LANTIGUA

ALFRED LANTIGUA DE LA CRUZ

AND

SIAMEL PEREZ

on or about February 20, 2014, at the City of Elizabeth, in the
County of Union, elsewhere, and within the jurisdiction of this
Court, knowingly did maintain or operate or knowingly did
participate in the maintenance or operation of a premise, place
or facility used for manufacturing a controlled dangerous
substance, that is, heroin and/or cocaine, contrary to the
provisions of N.J.S.A. 2C:35-4 and N.J.S.A. 2C:2-6, and against
the peace of this State, the government and dignity of the same.

COUNT THREE

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

JOSE CORREA

SANTA LANTIGUA

ALFRED LANTIGUA DE LA CRUZ

AND

SIAMEL PEREZ

on or about February 20, 2014, at the City of Elizabeth, in the County of Union, 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:35-5a(1), N.J.S.A. 2C:35-5b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

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

JOSE CORREA

SANTA LANTIGUA

ALFRED LANTIGUA DE LA CRUZ

AND

SIAMEL PEREZ

on or about February 20, 2014, at the City of Elizabeth, in the County of Union, 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 a quantity of five ounces or more including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

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

JOSE CORREA

SANTA LANTIGUA

ALFRED LANTIGUA DE LA CRUZ

AND

SIAMEL PEREZ

on or about February 20, 2014, at the City of Elizabeth, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with the intent to distribute a controlled dangerous substance, that is, oxycodone, a Schedule II narcotic drug, in a quantity of one-half ounce or more, including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(4), 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)

JOSE CORREA

SANTA LANTIGUA

ALFRED LANTIGUA DE LA CRUZ

AND

SIAMEL PEREZ

on or about February 20, 2014, at the City of Elizabeth, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute heroin and/or cocaine and/or oxycodone, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Juan Pablo Duarte - Jose Julian Marti School Number 28, which is owned by or leased to the Elizabeth 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

(Possession of a Controlled Dangerous
Substance - Third Degree)

JOSE CORREA

SANTA LANTIGUA

ALFRED LANTIGUA DE LA CRUZ

AND

SIAMEL PEREZ

on or about February 20, 2014, at the City of Elizabeth, in the County of Union, 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, and/or cocaine, a Schedule II controlled dangerous substance, and/or oxycodone, 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 EIGHT

(Tampering with Physical Evidence - Fourth Degree)

JOSE CORREA

on or about February 20, 2014, at the City of Elizabeth, in the County of Union, elsewhere, and within the jurisdiction of this court, believing that an official proceeding or investigation was pending or about to be instituted, knowingly did destroy an object, article, record, document or other thing of physical substance, that is, a controlled dangerous substance, with purpose to impair its verity or availability in such proceeding or investigation, contrary to the provisions of N.J.S.A. 2C:28-6(1), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Possession with Intent to Distribute Drug Paraphernalia-
Fourth Degree)

JOSE CORREA

SANTA LANTIGUA

ALFRED LANTIGUA DE LA CRUZ

AND

SIAMEL PEREZ

on or about February 20, 2014, at the City of Elizabeth, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly did possess drug paraphernalia with the intent to distribute same, knowing that it would be used to pack, repack, store, contain or conceal, a controlled dangerous substance or controlled dangerous substance analog, 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 TEN

(Money Laundering - Third Degree)

JOSE CORREA

SANTA LANTIGUA

ALFRED LANTIGUA DE LA CRUZ

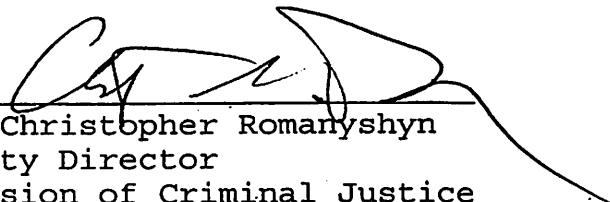
AND

SIAMEL PEREZ

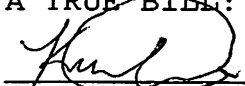
on or about February 20, 2014, at the City of Elizabeth, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property, in an amount less than \$75,000, known or which a reasonable person would believe to be derived from criminal activity, that is, JOSE CORREA, SANTA LANTIGUA, ALFRED LANTIGUA DE LA CRUZ AND SIAMEL PEREZ did transport or possess property, in an amount of approximately \$24,070 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:21-25(a) 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

By:


AAG Christopher Romanyshyn
Deputy Director
Division of Criminal Justice

A TRUE BILL:


Deputy Foreperson

Dated: 12-16-14

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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
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STATE OF NEW JERSEY)
v.)
JOSE CORREA)
SANTA LANTIGUA)
ALFRED LANTIGUA DE LA CRUZ)
and)
SIAMEL PEREZ)

ORDER OF VENUE

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

IT IS ORDERED on this *16th* day of *December*, 2014, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Union 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 Union for filing.

FILED

DEC 16 2014
State Grand Jury Judge

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