

FILED

SEP 12 2014

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ655-14-4

Superior Court

Docket Number 14-09-00137-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

OMAR URBINA SR.
a.k.a.
"O" OR "ODB")

EDWIN URBINA
a.k.a. "CATMAN"
a.k.a. "LITTLE ED")

EDWARD URBINA
a.k.a. "YAMIL"
a.k.a. "ANIMAL")

RIGO BELLO
a.k.a. "BIG BOOTS")

HERIBERTO NUNEZ
a.k.a. "BIGS")

SHADI TORRES
a.k.a. "SHADY")

ERIC SERRANO JR.
a.k.a. "CALVIN")

CARLOS GONZALEZ
a.k.a. "LOS")

ALEX SANTOS)

SHERON PULLIAM
a.k.a. "UNT")

ANTHONY MORRIS
a.k.a. "SQUEAKS")

PEDRO COLON
a.k.a. "SALINAS")

DANIEL MISTRETTA
a.k.a. "DAN DAN")

OMAR URBINA JR.
a.k.a. "LITTLE O")

ANDRE RUSSELL)

ISADIEL FALCON
a.k.a. "SHOTTY")

ADAMM CASTELLAR)

JOSEPH TORRES
a.k.a. "MOEY")

ULYSSES SERRANO
a.k.a. "CHE")

DEVON WILLIAMS)

ANTWAN SAULTERS
a.k.a. "ANT")

LONNIE REEVEY)

LAQUAE ST. JUSTE)

TYREE ROZIER
a.k.a. "PISTOL PETE")

ERIC CARABELLO
a.k.a. "PORARIC")

ERIC TRUSTY)

JAYMEAL YELDELL)

KEVIN MENA-CARMONA)
a.k.a. "MILAN")

WILLIAM LINCOLN)

JUAN GARCIA)
a.k.a. "LOS")

DANNY BORGES)
a.k.a. "PUTO")

JAMIE CINTRON)

JOSE RUIZ)
a.k.a. "DRAMA")
a.k.a. "KING DRAMA")

DANIEL TORO)
a.k.a. "CUSO")

DAVID TORO)

OSCAR ORTA)
a.k.a. "CHINA MAN")

ERIC MCNEIL)
a.k.a. "50")

SATURNINO NIEVES)

ROBERT NUNEZ)

RAQUEL MEDINA)

DONTE TUTTON)
a.k.a. "DONT")

and)

HECTOR JAVIER MENDEZ

a.k.a. "JAVIER")

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

COUNT ONE

(Racketeering - First Degree)

OMAR URBINA SR.

EDWIN URBINA

EDWARD URBINA

RIGO BELLO

HERIBERTO NUNEZ

SHADI TORRES

ERIC SERRANO JR.

CARLOS GONZALEZ

ALEX SANTOS

SHERON PULLIAM

ANTHONY MORRIS

PEDRO COLON

DANIEL MISTRETTA

OMAR URBINA JR.

ANDRE RUSSELL

ISADIEL FALCON

ADAMM CASTELLAR

JOSEPH TORRES

ULYSSES SERRANO
DEVON WILLIAMS
ANTWAN SAULTERS
LONNIE REEVEY
LAQUAE ST. JUSTE
TYREE ROZIER
ERIC CARABELLO
ERIC TRUSTY
JAYMEAL YELDELL
KEVIN MENA-CARMONA
WILLIAM LINCOLN
JUAN GARCIA
DANNY BORGES
JAMIE CINTRON
JOSE RUIZ
DANIEL TORO
DAVID TORO
OSCAR ORTA
ERIC MCNEIL
SATURNINO NIEVES
ROBERT NUNEZ
RAQUEL MEDINA
DONTE TUTTON

and

HECTOR JAVIER MENDEZ

who are named as the defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members of the criminal enterprise, but not named 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, 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 AND PLACES

The predicate criminal activity occurred between on or about December 1, 2012, and on or about November 14, 2013, at the City of Camden, at the City of Pennsauken, all in the County of Camden, and at the Township of Deptford, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

OMAR URBINA SR., EDWIN URBINA, EDWARD URBINA, RIGO BELLO, HERIBERTO NUNEZ, SHADI TORRES, ERIC SERRANO JR., CARLOS GONZALEZ, ALEX SANTOS, SHERON PULLIAM, ANTHONY MORRIS, PEDRO COLON, DANIEL

MISTRETTA, OMAR URBINA JR., ANDRE RUSSELL, ISADIEL FALCON, ADAMM CASTELLAR, JOSEPH TORRES, ULYSSES SERRANO, DEVON WILLIAMS, ANTWAN SAULTERS, LONNIE REEVEY, LAQUAE ST. JUSTE, TYREE ROZIER, ERIC CARABELLO, ERIC TRUSTY, JAYMEAL YELDELL, KEVIN MENA-CARMONA, WILLIAM LINCOLN, JUAN GARCIA, DANNY BORGES, JAMIE CINTRON, JOSE RUIZ, DANIEL TORO, DAVID TORO, OSCAR ORTA, ERIC MCNEIL, SATURNINO NIEVES, ROBERT NUNEZ, RAQUEL MEDINA, DONTE TUTTON, AND HECTOR JAVIER MENDEZ and other persons whose identities are known and unknown to the Grand Jurors, did constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise included collectively generating income on behalf of and for the benefit the enterprise through the manufacture and distribution of controlled dangerous substances using a defined structure with roles for each enterprise member or associate, dividing proceeds from enterprise members' and associates' criminal activities in accordance with enterprise protocol, and concealing from law enforcement authorities the existence of the enterprise, the means and locations from which it conducted its affairs, including but not limited to using wireless telephones, 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.

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 during the relevant time, including Leader of a Narcotics Trafficking Network (N.J.S.A. 2C:35-3), Financial Facilitation of Criminal Activity (N.J.S.A. 2C:21-25a and 25b), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession of a Weapon for Unlawful Purposes (N.J.S.A. 2C:39-4a), Employing a Juvenile in a Drug Distribution Scheme (N.J.S.A. 2C:35-6), Distribution of Controlled Dangerous Substances Within 1,000 Feet of School Property (N.J.S.A. 2C:35-7), Distribution of Controlled Dangerous Substances Within 500 Feet of Certain Public Property (N.J.S.A. 2C:35-7.1), Aggravated Assault (N.J.S.A. 2C:12-1b(1), 2C:12-1b(2), 2C:12-1b(4), 2C:12-1b(7)), Unlawful Disposition of a Firearm (N.J.S.A. 2C:58-1 et seq. and 39-9d) or conspiracies to commit these crimes, as described herein and in Counts Two through Eighteen of this Indictment.

OMAR URBINA SR.

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Leader of Narcotics Trafficking Network, Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Employing a Juvenile in a Drug Distribution Scheme, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Three, Four, Five, Six, Seven and Eight of this Indictment.

EDWIN URBINA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Leader of Narcotics Trafficking Network, Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Employing a Juvenile in a Drug Distribution Scheme, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Three, Four, Five, Six, Seven and Eight of this Indictment.

EDWARD URBINA

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Leader of Narcotics Trafficking Network, Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Employing a Juvenile in a Drug Distribution Scheme, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Three, Four, Five, Six and Seven of this Indictment.

RIGO BELLO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Four, Six, Seven and Eight of this Indictment.

HERIBERTO NUNEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Employing a Juvenile in a Drug Distribution

Scheme, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Four, Five, Six, Seven and Eight of this Indictment.

SHADI TORRES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Employing a Juvenile in a Drug Distribution Scheme, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, Financial Facilitation of Criminal Activity, Possession of a Weapon for Unlawful Purposes, and Aggravated Assault, which racketeering conduct is the subject of Counts Four, Five, Six, Seven, Seventeen, and Eighteen of this Indictment.

ERIC SERRANO JR.

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of

Controlled Dangerous Substances within 500 Feet of Certain Public Property, and Financial Facilitation of Criminal Activity which racketeering conduct is the subject of Counts Four, Six, Seven and Eight of this Indictment.

CARLOS GONZALEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

ALEX SANTOS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, and Aggravated Assault, which racketeering conduct is the subject of Counts Four, Six, Seven and Nine of this Indictment.

SHERON PULLIAM

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

ANTHONY MORRIS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, Possession of a Weapon for Unlawful Purposes, Aggravated Assault, and Attempted Aggravated Assault, which racketeering conduct is the subject of Counts Four, Six, Seven, Eleven, Twelve, Thirteen and Fourteen of this Indictment.

PEDRO COLON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution

of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

DANIEL MISTRETTA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six, and Seven of this Indictment.

OMAR URBINA JR.

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

ANDRE RUSSELL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled

Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment

ISADIEL FALCON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

ADAMM CASTELLAR

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

JOSEPH TORRES

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, and Financial Facilitation of Criminal Activity, which racketeering conduct is the subject of Counts Four, Six, Seven and Eight of this Indictment.

ULYSES SERRANO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

DEVON WILLIAMS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution

of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

ANTWAN SAULTERS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

LONNIE REEVEY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

LAQUAE ST. JUSTE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled

Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

TYREE ROZIER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

ERIC CARABELLO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

ERIC TRUSTY

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

JAYMEAL YELDELL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

KEVIN MENA-CARMONA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of

Counts Four, Six and Seven of this Indictment.

WILLIAM LINCOLN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

JUAN GARCIA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

DANNY BORGES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution

of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

JAMIE CINTRON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

JOSE RUIZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, and Aggravated Assault, which racketeering conduct is the subject of Counts Four, Six, Seven and Nine of this Indictment.

DANIEL TORO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous

Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

DAVID TORO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

OSCAR ORTA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

ERIC MCNEIL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

SATURNINO NIEVES

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

ROBERT NUNEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain

Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

RAQUEL MEDINA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

DONTE TUTTON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven of this Indictment.

HECTOR JAVIER MENDEZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Distribution of Controlled Dangerous Substances/Possession with Intent to Distribute Controlled Dangerous Substances, Distribution of Controlled Dangerous

Substances within 1,000 Feet of School Property, and Distribution of Controlled Dangerous Substances within 500 Feet of Certain Public Property, which racketeering conduct is the subject of Counts Four, Six and Seven 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.

COUNT TWO

(Conspiracy - Second Degree)

OMAR URBINA SR.

EDWIN URBINA

EDWARD URBINA

RIGO BELLO

HERIBERTO NUNEZ

SHADI TORRES

ERIC SERRANO JR.

CARLOS GONZALEZ

ALEX SANTOS

SHERON PULLIAM

ANTHONY MORRIS

PEDRO COLON

DANIEL MISTRETTA

OMAR URBINA JR.

ANDRE RUSSELL

ISADIEL FALCON

ADAMM CASTELLAR

JOSEPH TORRES

ULYSSES SERRANO

DEVON WILLIAMS

ANTWAN SAULTERS

LONNIE REEVEY

LAQUAE ST. JUSTE

TYREE ROZIER
ERIC CARABALLO
ERIC TRUSTY
JAYMEAL YELDELL
KEVIN MENA-CARMONA
WILLIAM LINCOLN
JUAN GARCIA
DANNY BORGES
JAMIE CINTRON
JOSE RUIZ
DANIEL TORO
DAVID TORO
OSCAR ORTA
ERIC MCNEIL
SATURNINO NIEVES
ROBERT NUNEZ
RAQUEL MEDINA
DONTE TUTTON
and
HECTOR JAVIER MENDEZ

who are named as the defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about December 1, 2012, and on or about November 14, 2013, at

the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Financial Facilitation of Criminal Activity, Distribution of a Controlled Dangerous Substance, Possession with the Intent to Distribute a Controlled Dangerous Substance, Possession with the Intent to Distribute a Controlled Dangerous Substance Within 1,000 feet of School Property and Possession with the Intent to Distribute a Controlled Dangerous Substance Within 500 feet of Public Property, did agree together and with persons whose identities are known and unknown to the Grand Jurors, who at all times relevant to this Indictment were sworn law enforcement officers acting in an undercover capacity or were cooperating witnesses acting under the direction of the New Jersey Division of Criminal Justice and/or other law enforcement agencies, that:

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

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

1. Knowingly did transport or possess property or did engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, with a value of at least \$75,000 but less than \$500,000, with the intent to facilitate or promote such activity or knowing that the transactions were designed in whole or in

part to conceal or disguise the nature, location, source, ownership, or control of the property derived from the said criminal activity, and/or by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be, or which a reasonable person would believe to be, derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-24, et seq.

2. Knowingly or purposely 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), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:35-5c, and N.J.S.A. 2C:2-6.

3. Knowingly or purposely possess with 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), N.J.S.A. 2C:35-5b(1), N.J.S.A. 2C:35-5c, and N.J.S.A. 2C:2-6.

4. Knowingly or purposely distribute and/or possess with intent to distribute a controlled dangerous substance within 1,000 feet of a school property, Coopers Poynt School, contrary to the provisions of N.J.S.A. 2C:35-7.

5. Knowingly or purposely distribute and/or possess with intent to distribute a controlled dangerous

substance within 500 feet of a public property, Pyne Point Park, contrary to the provisions of N.J.S.A. 2C:35-7.1.

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 THREE

(Leader of a Narcotics Trafficking Network - First Degree)

OMAR URBINA SR.

EDWIN URBINA

and

EDWARD URBINA

between on or about December 1, 2012, and on or about November 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did conspire with others 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 heroin, a schedule I controlled dangerous substance, and/or cocaine, a Schedule II controlled dangerous substances, contrary to the provisions of N.J.S.A. 2C:35-3, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Distribution of a Controlled Dangerous Substance/Possession with
Intent to Distribute a Controlled Dangerous Substance - First
Degree)

OMAR URBINA SR.

EDWIN URBINA

EDWARD URBINA

RIGO BELLO

HERIBERTO NUNEZ

SHADI TORRES

ERIC SERRANO JR.

CARLOS GONZALEZ

ALEX SANTOS

SHERON PULLIAM

ANTHONY MORRIS

PEDRO COLON

DANIEL MISTRETTA

OMAR URBINA JR.

ANDRE RUSSELL

ISADIEL FALCON

ADAMM CASTELLAR

JOSEPH TORRES

ULYSSES SERRANO

DEVON WILLIAMS

ANTWAN SAULTERS

LONNIE REEVEY

LAQUAE ST. JUSTE
TYREE ROZIER
ERIC CARABALLO
ERIC TRUSTY
JAYMEAL YELDELL
KEVIN MENA-CARMONA
WILLIAM LINCOLN
JUAN GARCIA
DANNY BORGES
JAMIE CINTRON
JOSE RUIZ
DANIEL TORO
DAVID TORO
OSCAR ORTA
ERIC MCNEIL
SATURNINO NIEVES
ROBERT NUNEZ
RAQUEL MEDINA
DONTE TUTTON
and
HECTOR JAVIER MENDEZ

between on or about December 1, 2012, and on or about November 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute and/or possess with intent to

distribute controlled dangerous substances, 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), N.J.S.A. 2C:35-5c, and N.J.S.A. 2C: 2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Employing a Juvenile in a Drug Distribution Scheme - Second Degree)

OMAR URBINA SR.

EDWIN URBINA

EDWARD URBINA

HERIBERTO NUNEZ

SHADI TORRES

between on or about December 1, 2012, and on or about November 14, 2013, at the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, knowingly did use, solicit, direct, hire or employ a person 17 years of age or younger to violate N.J.S.A. 2C:35-5a, contrary to the provisions of N.J.S.A. 2C:35-6 and N.J.S.A. 2C:2-6, 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)

OMAR URBINA SR.

EDWIN URBINA

EDWARD URBINA

RIGO BELLO

HERIBERTO NUNEZ

SHADI TORRES

ERIC SERRANO JR.

CARLOS GONZALEZ

ALEX SANTOS

SHERON PULLIAM

ANTHONY MORRIS

PEDRO COLON

DANIEL MISTRETTA

OMAR URBINA JR.

ANDRE RUSSELL

ISADIEL FALCON

ADAMM CASTELLAR

JOSEPH TORRES

ULYSSES SERRANO

DEVON WILLIAMS

ANTWAN SAULTERS

LONNIE REEVEY

LAQUAE ST. JUSTE

TYREE ROZIER
ERIC CARABELLO
ERIC TRUSTY
JAYMEAL YELDELL
KEVIN MENA-CARMONA
WILLIAM LINCOLN
JUAN GARCIA
DANNY BORGES
JAMIE CINTRON
JOSE RUIZ
DANIEL TORO
DAVID TORO
OSCAR ORTA
ERIC MCNEIL
SATURNINO NIEVES
ROBERT NUNEZ
RAQUEL MEDINA
DONTE TUTTON

and

HECTOR JAVIER MENDEZ

between on or about December 1, 2012, and November 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine and/or heroin, in violation of N.J.S.A. 2C:35-5a, while within

1,000 feet of Coopers Poynt School, a public school owned or leased by the Camden 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 on or Within
500 Feet of Public Property - Second Degree)

OMAR URBINA SR.

EDWIN URBINA

EDWARD URBINA

RIGO BELLO

HERIBERTO NUNEZ

SHADI TORRES

ERIC SERRANO JR.

CARLOS GONZALEZ

ALEX SANTOS

SHERON PULLIAM

ANTHONY MORRIS

PEDRO COLON

DANIEL MISTRETTA

OMAR URBINA JR.

ANDRE RUSSELL

ISADIEL FALCON

ADAMM CASTELLAR

JOSEPH TORRES

ULYSSES SERRANO

DEVON WILLIAMS

ANTWAN SAULTERS

LONNIE REEVEY

LAQUAE ST. JUSTE

TYREE ROZIER
ERIC CARABELLO
ERIC TRUSTY
JAYMEAL YELDELL
KEVIN MENA-CARMONA
WILLIAM LINCOLN
JUAN GARCIA
DANNY BORGES
JAMIE CINTRON
JOSE RUIZ
DANIEL TORO
DAVID TORO
OSCAR ORTA
ERIC MCNEIL
SATURNINO NIEVES
ROBERT NUNEZ
RAQUEL MEDINA
DONTE TUTTON

and

HECTOR JAVIER MENDEZ

between on or about December 1, 2012, and November 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine and/or heroin, in violation of N.J.S.A. 2C:35-5a, while within

500 feet of a public park, that being Pyne Point Park, contrary to the provisions of N.J.S.A. 2C:35-7.1, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Financial Facilitation of Criminal Activity – Second Degree)

OMAR URBINA SR.

EDWIN URBINA

ERIC SERRANO JR.

RIGO BELLO

HERIBERTO NUNEZ

SHADI TORRES

and

JOSEPH TORRES

between on or about December 1, 2012, and on or about November 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property or did engage in transactions involving property known to be, or which a reasonable person would believe to be, derived from criminal activity, with a value of at least \$75,000 but less than \$500,000, with the intent to facilitate or promote such activity or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the property derived from the said criminal activity, and/or by knowingly directing, organizing, financing, planning, managing, supervising, or controlling the transportation of or the transactions in property known to be, or which a reasonable person would believe to be, derived from criminal activity, that

is, OMAR URBINA SR., EDWIN URBINA, ERIC SERRANO JR., RIGO BELLO, HERIBERTO NUNEZ, SHADI TORRES, and JOSEPH TORRES, did transport or possess U.S. currency, make payments for the rental and/or purchase and/or maintenance of real and personal property, knowing, or having reason to believe, the property that was transported or possessed was derived from criminal activity, that the transactions involving said property were designed in whole or in part with the intent to facilitate or promote the criminal activity, or to conceal or disguise the nature, location, source, ownership, or control of the said property derived through criminal activity, or that the direction, organization, financing, planning, managing, supervision, or control of the transportation of or transactions in said property was of property 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:21-25b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Aggravated Assault - Third Degree)

JOSE RUIZ

and

ALEX SANTOS

on or about October 3, 2013, at the City of Camden, in the County of Camden, elsewhere, and withing the jurisdiction of this Court, did attempt to cause significant bodily injury to Kevin Mena Carmona, and/or purposely or knowingly did cause significant bodily injury to Kevin Mena Carmona, and/or under circumstances manifesting extreme indifference to the value of human life recklessly did cause significant bodily injury to Kevin Mena Carmona, contrary to the provisions of N.J.S.A. 2C:12-1b(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

(Unlawful Possession of a Weapon - Second Degree)

ANTHONY MORRIS

on or about May 4, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain firearm, that is, a handgun, 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

(Possession of a Weapon for Unlawful Purposes - Second Degree)

ANTHONY MORRIS

on or about May 4, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a firearm 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, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Aggravated Assault - Fourth Degree)

ANTHONY MORRIS

on or about May 4, 2013, at the City of Camden, in the County of Camden, 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 another, contrary to the provisions of N.J.S.A. 2C:12-1b(4), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Attempted Aggravated Assault - Second Degree)

ANTHONY MORRIS

on or about May 4, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause serious bodily injury to Kevin Alicea, contrary to the provisions of N.J.S.A. 2C:12-1b(1) and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Attempted Aggravated Assault - Third Degree)

ANTHONY MORRIS

on or about May 4, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did purposely attempt to cause bodily injury to Kevin Alicea with a deadly weapon, contrary to the provisions of N.J.S.A. 2C:12-1b(2) and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Conspiracy - Fourth Degree)

HERIBERTO NUNEZ

SHADI TORRES

who are named as the defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, on or about September 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Unlawful Disposition of a Weapon, did agree together and with persons whose identities are known and unknown to the Grand Jurors, who at all times relevant to this Indictment were sworn law enforcement officers acting in an undercover capacity or were cooperating witnesses acting under the direction of the New Jersey Division of Criminal Justice and/or other law enforcement agencies, that:

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

B. One or more of them would aid in the planning, solicitation or commission of said crimes, that is: 1.

Knowingly or purposely transport, ship, sell, or dispose of a firearm, without being licensed or registered to do so as provided in Chapter 58 of the New Jersey Criminal Code, contrary to the provisions of N.J.S.A. 2C:39-9d.

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

(Unlawful Possession of a Weapon - Second Degree)

SHADI TORRES

on or about September 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Ruger Mark II .22 caliber handgun, serial number 225-15496, 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 SEVENTEEN

(Possession of a Weapon for Unlawful Purposes - Second Degree)

SHADI TORRES

on or about September 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a firearm 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, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Aggravated Assault by Pointing A Firearm at Another - Fourth Degree)

SHADI TORRES

on or about September 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did knowingly under circumstances manifesting extreme indifference to the value of human life, point a firearm at or in the direction of another, contrary to the provisions of N.J.S.A. 2C:12-1b(4), and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Certain Persons Not to Have Weapons - Second Degree)

ANTHONY MORRIS

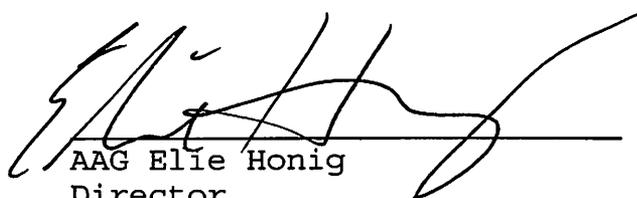
on or about October 21, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of possession with intent to distribute a controlled dangerous substance within 1,000 feet of school property (N.J.S.A. 2C:35-7), on Camden County Indictment Number 09-01-00341-I, did purchase, own, possess or control a weapon, that is, a Smith and Wesson .40 caliber semi automatic handgun, serial number RAN0317, contrary to the provisions of N.J.S.A. 2C:39-7b(1), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Certain Persons Not to Have Weapons - Second Degree)

SHADI TORRES

on or about September 14, 2013, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of possession with intent to distribute a controlled dangerous substance within 1,000 feet of school property (N.J.S.A. 2C:35-7), on Camden County Indictment Number 04-11-04502-I, did purchase, own, possess or control a weapon, that is, a Ruger Mark II .22 caliber handgun, serial number 225-15496, contrary to the provisions of N.J.S.A. 2C:39-7b(1), 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

Date: 9/12/14