

FILED

NO' 212014

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ660-14-12

Superior Court

Docket Number 14-11-00174-3

STATE OF NEW JERSEY)

v.)

MANUEL E. PEREZ-GUERRERO)

INDICTMENT

JUAN E. PEREZ-GUERRERO

LAKEY S. GUERRA-PUJOLS

FRANKLIN N. MEJIA

ALEXSANDER PADRO

ROSALINE ENGRACIA ULLOA

and

JOSE L. ROMERO-RIVERA
a.k.a. LUIS MANUEL TEJEDA
CHALAS

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

COUNT ONE

(Conspiracy - Second Degree)

MANUEL E. PEREZ-GUERRERO

JUAN E. PEREZ-GUERRERO

LAKEY S. GUERRA-PUJOLS

FRANKLIN N. MEJIA

ALEXSANDER PADRO

ROSALINE ENGRACIA ULLOA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS who are named as defendants herein, and other persons whose identities are unknown to the Grand Jurors who are named as co-conspirators but not as defendants herein, between on or about March 18, 2014, and on or about March 29, 2014, at the City of Hackensack and at the Township of Saddle Brook, both in the County of Bergen, 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 crimes of 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 possess with intent to distribute a controlled dangerous substance, that is, heroin, 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),
and N.J.S.A. 2C:35-5b(1);

2. Knowingly or purposely maintain or operate or
knowingly participate in the maintenance or operation 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.

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 Intent to Distribute
a Controlled Dangerous Substance - First Degree)

MANUEL E. PEREZ-GUERRERO

FRANKLIN MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS
on or about March 29, 2014, 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 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, and
against the peace of this State, the government and dignity of
the same.

COUNT THREE

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

MANUEL E. PEREZ-GUERRERO

JUAN E. PEREZ-GUERRERO

LAKEY S. GUERRA-PUJOLS

and

ALEXSANDER PADRO

on or about March 29, 2014, at the City of Hackensack and the Township of Saddlebrook, both in the County of Bergen, 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 or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2), 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 of a Controlled Dangerous
Substance - Third Degree)

MANUEL E. PEREZ-GUERRERO

JUAN E. PEREZ-GUERRERO

LAKEY S. GUERRA-PUJOLS

ALEXSANDER PADRO

FRANKLIN N. MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS

on or about March 29, 2014, at the City of Hackensack and at the Township of Saddlebrook, both in the County of Bergen, at the City of Paterson, in the County of Passaic, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

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

MANUEL E. PEREZ-GUERRERO

FRANKLIN N. MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS
on or about March 29, 2014, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely 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, 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 SIX

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

MANUEL E. PEREZ-GUERRERO

JUAN E. PEREZ-GUERRERO

LAKEY S. GUERRA-PUJOLS

FRANKLIN N. MEJIA

ALEXSANDER PADRO

ROSALINE ENGRACIA ULLOA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS

on or about March 29, 2014, at the City of Hackensack and at the Township of Saddle Brook, both in the County of Bergen, at the City of Paterson, in the County of Passaic, 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 SEVEN

(Unlawful Possession of a Weapon - Second Degree)

MANUEL E. PEREZ-GUERRERO

FRANKLIN MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS

on or about March 29, 2014, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a Taurus "Ultra-Lite" .38 caliber special revolver bearing Serial Number YL22134, 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 N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Possession of a Weapon in Course of Committing CDS Offense -
Second Degree)

MANUEL E. PEREZ-GUERRERO

FRANKLIN MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS

on or about March 29, 2014, at the City of Passaic, in the County of Paterson, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a Taurus "Ultra-Lite" .38 caliber special revolver bearing Serial Number YL22134, while in the course of committing or attempting to commit a violation of N.J.S.A. 2C:35-5 and/or N.J.S.A. 2C:35-4, contrary to the provisions of N.J.S.A. 2C:39-4.1 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 of Dum Dum Bullets - Fourth Degree)

MANUEL E. PEREZ-GUERRERO

ROSALINE ENGRACIA ULLOA

FRANKLIN MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS
on or about March 29, 2014, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly did possess a certain weapon or device, that is,
hollow point bullets, contrary to the provisions of N.J.S.A.
2C:39-3f 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)

MANUEL E. PEREZ-GUERRERO

and

ROSALINE ENGRACIA ULLOA

on or about March 29, 2014, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, that is, the said MANUEL E. PEREZ-GUERRERO and ROSALINE ENGRACIA ULLOA did possess approximately \$16,841 in United States 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 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Unlawful Possession of a Weapon - Second Degree)

MANUEL E. PEREZ-GUERRERO

FRANKLIN MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS
on or about March 29, 2014, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly did possess a certain weapon, that is, a Sturm,
Ruger & Co. Model P90DC .45 caliber semi-automatic pistol bearing
Serial Number 660-12495, 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 N.J.S.A. 2C:2-6, and against
the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Possession of a Weapon in Course of Committing CDS Offense -
Second Degree)

MANUEL E. PEREZ-GUERRERO

FRANKLIN MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS
on or about March 29, 2014, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly did possess a firearm, that is, a Sturm, Ruger &
Co. Model P90DC .45 caliber semi-automatic pistol bearing Serial
Number 660-12495, while in the course of committing or attempting
to commit a violation of N.J.S.A. 2C:35-5 and/or N.J.S.A. 2C:35-
4, contrary to the provisions of N.J.S.A. 2C:39-4.1 and N.J.S.A.
2C:2-6, and against the peace of this State, the government and
dignity of the same.

COUNT THIRTEEN

(Receiving of Stolen Property - Third Degree)

MANUEL E. PEREZ-GUERRERO

FRANKLIN MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS
on or about March 29, 2014, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, did commit theft by knowingly receiving or bringing into
this State movable property of another, namely a firearm, that
is, a Sturm, Ruger & Co. Model P90DC .45 caliber semi-automatic
pistol bearing Serial Number 660-12495, knowing the same to be
stolen or believing that it had probably been stolen, contrary to
the provisions of N.J.S.A. 2C:20-7 and N.J.S.A. 2C:2-6, and
against the peace of this State, the government and dignity of
the same.

COUNT FOURTEEN

(Prohibited Devices - Fourth Degree)

MANUEL E. PEREZ-GUERRERO

FRANKLIN MEJIA

and

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS
on or about March 29, 2014, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, knowingly did possess a certain weapon or device, that is,
a firearms silencer, contrary to the provisions of N.J.S.A.
2C:39-3c and N.J.S.A. 2C:2-6, and against the peace of this
State, the government and dignity of the same.

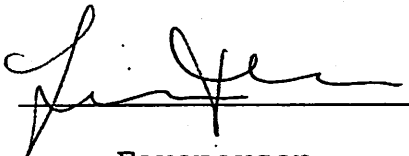
COUNT FIFTEEN

(Possession of a Weapon by a Convicted Person - Second Degree)

JOSE L. ROMERO-RIVERA a.k.a. LUIS MANUEL TEJEDA CHALAS ~~CHALAS~~ *mis (typo)*
on or about March 29, 2014, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, having been convicted of the crime of Possession with the
Intent to Distribute Cocaine Base (Crack) on Case Number 3:06-CR-
246-01 in United States District Court, Middle District of
Pennsylvania, did purchase, own, possess or control a Sturm,
Ruger & Co. Model P90DC .45 caliber semi-automatic pistol bearing
Serial Number 660-12495, and/or a Taurus "Ultra-Lite" .38 caliber
special revolver bearing Serial Number YL22134, contrary to the
provisions of N.J.S.A. 2C:39-7b, and against the peace of this
State, the government and dignity of the same.

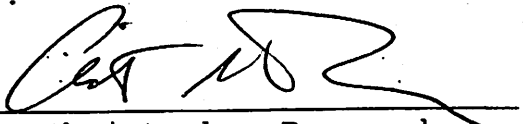
AAG Elie Honig
Director
Division of Criminal Justice

A TRUE BILL:


Foreperson

Dated: 11/29/2014

By:


AAG Christopher Romanyshyn
Deputy Director
Division of Criminal Justice

FILED

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

NOV 21 2014

State Grand Jury Judge

State Grand Jury

Number SGJ660-14-12

Superior Court

Docket Number

14-11-00174-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

MANUEL E. PEREZ-GUERRERO)

JUAN E. PEREZ-GUERRERO)

LAKEY S. GUERRA-PUJOLS)

FRANKLIN N. MEJIA)

ALEXSANDER PADRO)

ROSALINE ENGRACIA ULLOA)

and)

JOSE L. ROMERO-RIVERA)

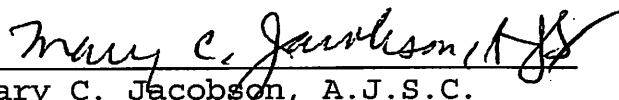
also known as

LUIS MANUEL TEJEDA CHALAS)

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

IT IS ORDERED on this *21st* day of *November*, 2014, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Bergen 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 Bergen for filing.


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