

PEDRO ARIAS

HORACIO LLERENA-MARTINEZ

OSMAY PEREZ-HERRERA

WILSON FERRER-REYES

HECTOR RIVAS

KENNETH MANUS

ANGEL DOMINQUEZ

CARLOS TORIAC-ALMIRA

and

LUIS MARIN

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not named as defendants herein, between on or about June 20, 2012, and on or about April 27, 2015, at the Township of Saddle Brook and the Borough of Little Ferry, both in the County of Bergen, at the City of Linden, at the Township of Hillside, and at the City of Elizabeth, all in the County of Union, at the Township of Readington, in the County of Hunterdon, at the City of Passaic and at the City of Paterson, both in the County of Passaic, at the Township of North Bergen and at the Town of Kearny, both in the County of Hudson, at the City of Newark, in the County of Essex, at the Township of Sayerville and at the Borough of South Plainfield, both in the County of Middlesex, in the State of Pennsylvania; in the State of New York; in the State of Florida,

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 (Money Laundering), Burglary, Theft, Receiving Stolen Property, Fencing, and Counterfeiting did agree together and with persons known to the Grand Jurors who were acting at the direction of law enforcement 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, attempt or commission of the aforesaid crimes, that is:

1. Knowingly or purposely did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, with an aggregate value in excess of \$500,000.00, or did engage in transactions involving such property with the intent to promote or facilitate the criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b(1); and

2. Knowingly did enter a structure, with the purpose to commit theft therein, contrary to the provisions of N.J.S.A. 2C:18-2; and

3. Knowingly did unlawfully take or exercise control over movable property of others, having an aggregate value in excess

of \$75,000.00, with the purpose to deprive the owners thereof, contrary to the provisions of N.J.S.A. 2C:20-3a; and

4. Knowingly did commit a theft by receiving or bringing into this State moveable property of others having an aggregate value in excess of \$75,000.00, 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(a); and

5. Knowingly did traffic in, or initiate, organize, plan, finance, direct, manage or supervise the trafficking in stolen property valued in excess of \$75,000.00, contrary to the provisions of N.J.S.A. 2C:20-7.1b; and

6. Knowingly with the intent to deceive or defraud some other person, did display, advertise, distribute, offer for sale, sell, possess with intent to sell, or distribute within, or in conjunction with commercial activities within New Jersey, items bearing, or identified by, counterfeit trademarks in an amount of 100 or more, contrary to the provisions of N.J.S.A. 2C:21-32c and N.J.S.A. 2C:21-32d(2), and against the peace of this State, the government and dignity of the same.

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

COUNT TWO

(Financial Facilitation of Criminal Activity - First Degree)

YOANNY JUSTIZ

LUIS REQUENA

MARVIN QUEZADA

PEDRO ARIAS

HORACIO LLERENA-MARTINEZ

OSMAY PEREZ-HERRERA

WILSON FERRER-REYES

HECTOR RIVAS

KENNETH MANUS

ANGEL DOMINQUEZ

and

LUIS MARIN

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not named as defendants herein, between on or about June 20, 2012, and on or about April 27, 2015, at the Township of Saddle Brook, in the County of Bergen, at the City of Linden, at the Township of Hillside, and at the City of Elizabeth, all in the County of Union, at the Township of Readington, in the County of Hunterdon, at the City of Passaic and at the City of Paterson, both in the County of Passaic, at the Township of North Bergen and at the Town of Kearny, both in the County of Hudson, at the City of

Newark, in the County of Essex, at the Township of Sayerville and at the Borough of South Plainfield, both in the County of Middlesex, in the State of Pennsylvania; in the State of New York; elsewhere, and within the jurisdiction of the Court, did commit the offense of financial facilitation of criminal activity, in that, the said YOANNY JUSTIZ, LUIS REQUENA, MARVIN QUEZADA, PEDRO ARIAS, HORACIO LLERENA-MARTINEZ, OSMAY PEREZ-HERRERA, WILSON FERRER-REYES, HECTOR RIVAS, KENNETH MANUS, ANGEL DOMINQUEZ, and LUIS MARIN and other persons whose identities are known and unknown to the Grand Jurors, did transport or possess property, known, or which a reasonable person would believe to be derived from criminal activity, with an aggregate value in excess of \$500,000.00, or did engage in transactions involving such property with the intent to facilitate or promote the criminal activity, all contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Burglary - Third Degree)

YOANNY JUSTIZ

LUIS REQUENA

MARVIN QUEZADA

PEDRO ARIAS

HORACIO LLERENA-MARTINEZ

OSMAY PEREZ-HERRERA

WILSON FERRER-REYES

HECTOR RIVAS

KENNETH MANUS

ANGEL DOMINQUEZ

and

LUIS MARIN

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Newark, in the County of Essex, at the Township of Sayerville and at the Borough of South Plainfield, both in the County of Middlesex, in the State of Pennsylvania; in the State of New York; elsewhere; and within the jurisdiction of the Court, did knowingly enter a structure, with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2a(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

(Theft by Unlawful Taking - Second Degree)

YOANNY JUSTIZ

LUIS REQUENA

MARVIN QUEZADA

PEDRO ARIAS

HORACIO LLERENA-MARTINEZ

OSMAY PEREZ-HERRERA

WILSON FERRER-REYES

HECTOR RIVAS

KENNETH MANUS

ANGEL DOMINQUEZ

and

LUIS MARIN

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not named as defendants herein, between on or about June 20, 2012, and on or about April 27, 2015, at the Township of Saddle Brook, in the County of Bergen, at the City of Linden, at the Township of Hillside, and at the City of Elizabeth, all in the County of Union, at the Township of Readington, in the County of Hunterdon, at the City of Passaic and at the City of Paterson, both in the County of Passaic, at the Township of North Bergen and at the Town of Kearny, both in the County of Hudson, at the City of

Newark, in the County of Essex, at the Township of Sayerville and at the Borough of South Plainfield, both in the County of Middlesex, in the State of Pennsylvania; in the State of New York; elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise control over movable property of others, that is, various cargo items, trailers, and motor vehicles, having an aggregate value in excess of \$75,000.00, with the purpose to deprive the owners thereof, contrary to the provisions of N.J.S.A. 2C:20-3a, N.J.S.A. 2C:20-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Fencing- Dealing in Stolen Property - Second Degree)

YOANNY JUSTIZ

LUIS REQUENA

MARVIN QUEZADA

PEDRO ARIAS

HORACIO LLERENA-MARTINEZ

OSMAY PEREZ-HERRERA

WILSON FERRER-REYES

HECTOR RIVAS

KENNETH MANUS

ANGEL DOMINQUEZ

and

LUIS MARIN

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Newark, in the County of Essex, at the Township of Sayerville and at the Borough of South Plainfield, both in the County of Middlesex, in the State of Pennsylvania; in the State of New York; in the State of Florida, elsewhere, and within the jurisdiction of the Court, knowingly did traffic in, or initiate, organize, plan, finance, direct, manage, or supervise the trafficking in stolen property, having an aggregate value in excess of \$75,000.00, contrary to the provisions of N.J.S.A. 2C:20-7.1b, N.J.S.A. 2C:20-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Receiving Stolen Property- Second Degree)

YOANNY JUSTIZ

LUIS REQUENA

MARVIN QUEZADA

PEDRO ARIAS

HORACIO LLERENA-MARTINEZ

OSMAY PEREZ-HERRERA

WILSON FERRER-REYES

HECTOR RIVAS

KENNETH MANUS

ANGEL DOMINQUEZ

and

LUIS MARIN

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not named as defendants herein, between on or about June 20, 2012, and on or about April 27, 2015, at the Township of Saddle Brook, in the County of Bergen, at the City of Linden, at the Township of Hillside, and at the City of Elizabeth, all in the County of Union, at the Township of Readington, in the County of Hunterdon, at the City of Passaic and at the City of Paterson, both in the County of Passaic, at the Township of North Bergen and at the Town of Kearny, both in the County of Hudson, at the City of

Newark, in the County of Essex, at the Township of Sayerville and at the Borough of South Plainfield, both in the County of Middlesex, in the State of Pennsylvania; in the State of New York; in the State of Florida, elsewhere, and within the jurisdiction of this Court did commit theft by knowingly receiving or bringing into this State moveable property of others, that is, various cargo items, trailers and motor vehicles, having an aggregate value in excess of \$75,000.00, 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, N.J.S.A. 2C:20-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Counterfeiting- Third Degree)

HORACIO LLERENA-MARTINEZ

and

OSMAY PEREZ-HERRERA

between on or about September 24, 2013, and on or about November 14, 2013, at the Township of North Bergen, in the County of Hudson, in the State of New York, elsewhere and within the jurisdiction of this Court, with the intent to deceive or defraud some other person, knowingly did display, advertise, distribute, offer for sale, sell, possess with intent to sell, or distribute within, or in conjunction with commercial activities within New Jersey, items bearing, or identified by, counterfeit trademarks in an amount of 100 or more, that is, jackets bearing counterfeit North Face trademarks, contrary to the provisions of N.J.S.A. 2C:21-32c and N.J.S.A. 2C:21-32d(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Attempted Theft- Second Degree)

OSMAY PEREZ-HERRERA

between on or about September 31, 2013 and on or about December 20, 2013, at the Township of North Bergen, in the County of Hudson, at the in the State of New York, elsewhere and within the jurisdiction of this Court, purposely did attempt to unlawfully take or exercise control over movable property of others, that is perfume, having a value in excess of \$75,000.00, with the purpose to deprive the owners thereof, contrary to the provisions of N.J.S.A. 2C:20-3a, N.J.S.A. 2C:20-2, and N.J.S.A. 2C:2-6, and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Receiving Stolen Property- Third Degree)

YOANNY JUSTIZ

and

CARLOS TORIAC-ALMIRA

on or about January 22, 2015, at the Borough of Little Ferry, in the County of Bergen, elsewhere, and within the jurisdiction of this Court did commit theft by knowingly receiving or bringing into this State moveable property of another, that is a trailer, having a value in excess of \$500.00, 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 TEN

(Motor Vehicle Master Keys - Fourth Degree)

YOANNY JUSTIZ

MARVIN QUEZADA

and

PEDRO ARIAS


on or about September 27, 2013, at the Borough of Sayerville, in the County of Middlesex, elsewhere, and within the jurisdiction of the Court, knowingly did possess a motor vehicle master key or device designed to operate a lock or locks on motor vehicles or to start a motor vehicle without an ignition key, contrary to the provisions of N.J.S.A. 2C:5-6 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

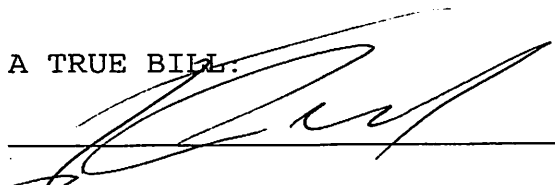
(Eluding - Third Degree)

PEDRO ARIAS

on or about September 27, 2013, at the at the Township of Sayerville, in the County of Middlesex, elsewhere and within the jurisdiction of this Court, while operating a motor vehicle on a street or highway in this State, knowingly did flee or attempt to elude a police or law enforcement officer after having received a signal from such officer to bring that motor vehicle to a stop, that is, the said PEDRO ARIAS, did operate a motor vehicle on or near the New Jersey Turnpike, and having received a signal to bring that motor vehicle to a stop by Detective Jafka Mandziuk of the New Jersey State Police, did flee and attempt to elude Detective Jafka Mandziuk contrary to the provisions of N.J.S.A. 2C:29-2b, 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: 9/27/2015

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

FILED
JUN 04 2015
State Grand Jury Judge

State Grand Jury
Number SGJ669-15-11
Superior Court
Docket Number 15-06-00078-S

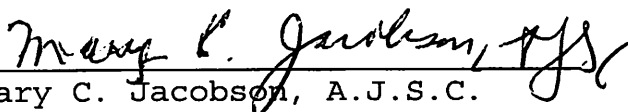
STATE OF NEW JERSEY)
v.)
YOANNY JUSTIZ)
LUIS REQUENA)
MARVIN QUEZADA)
PEDRO ARIAS)
HORACIO LLERENA-MARTINEZ)
OSMAY PEREZ-HERRERA)
WILSON FERRER-REYES)
HECTOR RIVAS)
KENNETH MANUS)
ANGEL DOMINQUEZ)
CARLOS TORIAC-ALMIRA)
and)
LUIS MARIN)

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 4th day of June, 2015,
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.