

FILED

JUL 13 2017

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ704-17-1

Superior Court 17-07-00123 S

Docket Number _____

STATE OF NEW JERSEY)

v.)

JAPHET LOPEZ)
AKA "KING JAPHET"

KIELE LOPEZ)
AKA "KING FORTY"

CARLOS RODRIGUEZ)
AKA "KING FUTURE"

JUSTIN RODRIGUEZ)
AKA "KING JAY AIRY"

ISRAEL CARRERAS)
AKA "KING SOLLE"

JULIO BENABE)
AKA "KING COCO"

CHRISTOPHER VELEZ)
AKA "BOXING CHRIS"

LUIS MALDONADO)
AKA "KING SANTO"

EDGARDO MENDEZ)
AKA "KING ITO"

LUIS DIAZ)
AKA "KING STEVIE"

ANGELO RODRIGUEZ)
AKA "TITO"

JOSE D. TORRES)
AKA "WOP"

EDWIN ROMAN III)
AKA "CHICKEN LITTLE"

JOHN J. RUIZ)

CHRISTIAN PADILLA)

YARITZA PEREZ)

KEISHA COLON)

VIDALINDA TORRES)

and)

JADNIER RIOS)
AKA JADNIER TORRES

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

COUNT ONE

(Racketeering - First Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

CARLOS RODRIGUEZ AKA "KING FUTURE"

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

ISRAEL CARRERAS AKA "KING SOLLE"

JULIO BENABE AKA "KING COCO"

CHRISTOPHER VELEZ AKA "BOXING CHRIS"

LUIS MALDONADO AKA "KING SANTO"

CHRISTIAN PADILLA

JOHN J. RUIZ

ANGELO RODRIGUEZ AKA "TITO"

JOSE D. TORRES AKA "WOP"

EDWIN ROMAN III AKA "CHICKEN LITTLE"

LUIS DIAZ AKA "KING STEVIE"

and

EDGARDO MENDEZ AKA "KING ITO"

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 to commit the conduct of the enterprise's affairs through a pattern of racketeering activity, including the commission of crimes of violence, crimes of the first degree, and/or crimes involving the use of firearms, 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

The predicate criminal activity occurred between on or about October 2015, and on or about May 2017.

THE RELEVANT PLACES

The predicate criminal activity took place at the City of Newark, and at the Township of Belleville, both in the County of Essex, in the Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

JAPHET LOPEZ AKA "KING JAPHET", KIELE LOPEZ AKA "KING FORTY", CARLOS RODRIGUEZ AKA "KING FUTURE", JUSTIN RODRIGUEZ AKA "KING JAY AIRY", ISRAEL CARRERAS AKA "KING SOLLE", JULIO BENABE AKA "KING COCO", CHRISTOPHER VELEZ AKA "BOXING CHRIS", LUIS MALDONADO AKA "KING SANTO", CHRISTIAN PADILLA, JOHN J. RUIZ, ANGELO RODRIGUEZ AKA "TITO", JOSE D. TORRES AKA "WOP", EDWIN ROMAN III AKA "CHICKEN LITTLE", LUIS DIAZ AKA "KING STEVIE", and EDGARDO MENDEZ AKA "KING ITO" 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 union or group of individuals associated in fact, or associates thereof, which, among other names, members or associates thereof self-identified as the "Almighty Latin King and Queen Nation" criminal street gang, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise would include the maintenance of its strength and the assurance of its perpetuation through specific rules and protocols applicable to

its members and associates, including: discussing matters pertaining to the operation, conduct and control of the enterprise with no one other than members or highly trusted associates of the enterprise; resolving disputes or seeking direction from superiors within the enterprise through a specific chain of command; enforcing the protocols of the enterprise through any means necessary, including threats or use of violence; keeping a member's immediate supervisor within the enterprise informed of illegal activities and law enforcement activities targeting the enterprise; collectively generating income on behalf of and for the benefit of the enterprise through various illicit schemes; and dividing proceeds from enterprise members' criminal activities in accordance with enterprise protocol. A further purpose of the enterprise would be to shield its operation from detection by law enforcement authorities by, among other means: using code words when communicating; resorting to in-person meetings; using wireless telephones in fictitious or nominee names; informing other members to avoid certain areas at certain times with law enforcement presence has been detected.

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

committed by members of the enterprise during the relevant time period stated above, including but not limited to: maintaining or operating a controlled dangerous substance production facility in violation of N.J.S.A. 2C:35-4, crimes involving illegal distribution of controlled dangerous substances in violation of N.J.S.A. 2C:35-5, crimes involving illegal distribution of controlled dangerous substances within 1,000 feet of school property in violation of N.J.S.A. 2C:35-7, crimes involving illegal distribution of controlled dangerous substances within 500 feet of certain public property in violation of N.J.S.A. 2C:35-7.1, robbery in violation of N.J.S.A. 2C:15-1, purposeful or knowing assault in violation of N.J.S.A. 2C:12-1 et. seq., witness tampering in violation of 18 U.S.C. 1961(1)(B) and 18 U.S.C. 1513, hindering apprehension in violation of 18 U.S.C. 1961(1)(B) and 18 U.S.C. 1512, terroristic threats in violation of N.J.S.A. 2C:12-3, money laundering in violation of N.J.S.A. 2C:21-25, and conspiracy to commit the foregoing crimes in violation of N.J.S.A. 2C:5-2, primarily in the following ways:

JAPHET LOPEZ AKA "KING JAPHET"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of maintaining or operating a controlled dangerous substance production facility, distribution/possession with intent to distribute controlled

dangerous substances, distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, robbery, possession of a weapon for an unlawful purpose, aggravated assault, witness tampering, hindering apprehension, and terroristic threats, all of which is the subject of Counts 3, 4, 5, 7, 13, 16, 17, 54, 55, 56, 57, 59, 60, 61, 62, 63, and 64, as well as other conduct.

KIELE LOPEZ AKA "KING FORTY"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of maintaining or operating a controlled dangerous substance production facility, distribution/possession with intent to distribute controlled dangerous substances, distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, robbery, possession of a weapon for an unlawful purpose, aggravated assault, witness tampering, and hindering apprehension, all of which is the subject of Counts 3, 4, 5, 6, 12, 13, 16, 17, 43, 54, 55, 56, 57, 59, 60, 61, 63 and 64, as well as other conduct.

CARLOS RODRIGUEZ AKA "KING FUTURE"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of maintaining or operating a controlled dangerous substance production facility, distribution/possession with intent to distribute controlled

dangerous substances, possession of a weapon while committing certain controlled dangerous substance offenses, money laundering, distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, and aggravated assault, all of which is the subject of Counts 3, 23, 24, 26, 28, 43, 54, 57, 63, and 64, as well as other conduct.

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of maintaining or operating a controlled dangerous substance production facility, distribution/possession with intent to distribute controlled dangerous substances, robbery, distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, aggravated assault, and possession of a weapon for an unlawful purpose, all of which is the subject of Counts 3, 4, 5, 10, 11, 16, 42, 43, 54, 55, 56, and 57, as well as other conduct.

ISRAEL CARRERAS AKA "KING SOLLE"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of robbery, aggravated assault, and possession of a weapon for an unlawful purpose, all of which is the subject of Counts 54, 55, 56, and 57, as well as other conduct.

JULIO BENABE AKA "KING COCO"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of robbery, aggravated assault, and possession of a weapon for an unlawful purpose, all of which is the subject of Counts 54, 55, 56, and 57, as well as other conduct.

CHRISTOPHER VELEZ AKA "BOXING CHRIS"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of aggravated assault, all of which is the subject of Counts 63, and 64, as well as other conduct.

LUIS MALDONADO AKA "KING SANTO"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of aggravated assault, all of which is the subject of Counts 63, and 64, as well as other conduct.

CHRISTIAN PADILLA

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of maintaining or operating a controlled dangerous substance production facility, distribution/possession with intent to distribute controlled dangerous substances, and distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of

a school zone, all of which is the subject of Counts 3, 4, 5, 16, 19, 21, and 22, as well as other conduct.

JOHN J. RUIZ

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of distribution/possession with intent to distribute controlled dangerous substances, distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, and possession of a weapon while committing a controlled dangerous substance offenses, all of which is the subject of Counts 3, 36, 38, 40, 42, and 43, as well as other conduct.

ANGELO RODRIGUEZ AKA "TITO"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of distribution/possession with intent to distribute controlled dangerous substances, and distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, all of which is the subject of Counts 3, 29, and 43, as well as other conduct.

JOSE D. TORRES AKA "WOP"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of distribution/possession with intent to distribute controlled dangerous substances, possession of a handgun while committing a controlled dangerous

substance offense, and distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, all of which is the subject of Counts 3, 35, 36, 38, 40, 42, and 43, as well as other conduct.

EDWIN ROMAN III AKA "CHICKEN LITTLE"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of distribution/possession with intent to distribute controlled dangerous substances, and distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, all of which is the subject of Counts 3, 31, 33, 42, and 43, as well as other conduct.

LUIS DIAZ AKA "KING STEVIE"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of distribution/possession with intent to distribute controlled dangerous substances, and distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, all of which is the subject of Counts 3, 8, and 16, as well as other conduct.

EDGARDO MENDEZ AKA "KING ITO"

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of distribution/possession with intent to distribute controlled dangerous substances,

distribution/possession with intent to distribute controlled dangerous substances within 1,000 feet of a school zone, and distribution/possession with intent to distribute controlled dangerous substances within 500 feet of public property, all of which is the subject of Counts 3, 44, 46, 48, 49, 50, and 51, as well as other conduct.

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

(Promoting Organized Street Crime - First Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

CHRISTOPHER VELEZ AKA "BOXING CHRIS"

and

LUIS MALDONADO AKA "KING SANTO"

between on or about October 1, 2015 and on or about May 12, 2017, at the City of Newark, in the County of Essex, in the Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, did conspire with others as an organizer, supervisor, financier or manager to commit the crimes of possession with intent to distribute controlled dangerous substances, in violation of N.J.S.A. 2C:35-5, and/or distribution of controlled dangerous substances, in violation of N.J.S.A. 2C:35-5, and/or distribution of controlled dangerous substances within 1,000 feet of a school, in violation of N.J.S.A. 2C:35-7, and/or distribution of controlled dangerous substances within 500 feet of public property, in violation of N.J.S.A. 2C:35-7.1a, and/or robbery in violation of N.J.S.A. 2C:15-1, and/or possession of a weapon for an unlawful purpose in violation of N.J.S.A. 2C:39-4, and/or aggravated assault in violation of N.J.S.A. 2C:12-1, and/or criminal restraint in violation of N.J.S.A. 2C:13-2, contrary to the provisions of

N.J.S.A. 2C:33-30 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)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

CARLOS RODRIGUEZ AKA "KING FUTURE"

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

CHRISTIAN PADILLA

JOHN J. RUIZ

ANGELO RODRIGUEZ AKA "TITO"

JOSE D. TORRES AKA "WOP"

EDWIN ROMAN III AKA "CHICKEN LITTLE"

LUIS DIAZ AKA "KING STEVIE"

YARITZA PEREZ

KEISHA COLON

VIDALINDA TORRES

EDGARDO MENDEZ AKA "KING ITO"

and

JADNIER RIOS AKA JADNIER TORRES

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, between on or about January 27, 2016, and on or about October 6, 2016, at the City of Newark, in the County of Essex, 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, distribution of a controlled dangerous substance, possession with intent to distribute a controlled dangerous substance, possession with intent to distribute and/or distribution within 1,000 feet of school property, money laundering, and/or distribution of drug paraphernalia did agree that:

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

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

1. 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, cocaine, contrary to the provisions of N.J.S.A. 2C:35-4;

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;

3. Knowingly possess with intent to distribute and/or distribute a controlled dangerous substance, that is, cocaine, 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:35-5c;

4. Knowingly possess with intent to distribute and/or 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:35-5c;

5. Knowingly possess with intent to distribute and/or distribute a controlled dangerous substance, that is cocaine, in violation of N.J.S.A. 2C:35-5a(1), within 1,000 feet of the Ridge Street Early Childhood Center, and/or the Branch Brook School, which are owned by or leased to the Newark Board of Education and used for school purposes, and/or St. Peter's School, which is owned by or leased to the Archdiocese of Newark and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7;

6. Knowingly possess with intent to distribute and/or distribute a controlled dangerous substance, that is heroin, in violation of N.J.S.A. 2C:35-5a(1), within 1,000 feet of the Ridge Street Early Childhood Center, and/or the Branch Brook School, which are owned by or leased to the Newark Board of

Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7;

7. Knowingly possess with intent to distribute and/or distribute a controlled dangerous substance, that is marijuana, in violation of N.J.S.A. 2C:35-5a(1), within 1,000 feet of the St. Peter's School, which is owned by or leased to the Archdiocese of Newark and used for school purposes,, contrary to the provisions of N.J.S.A. 2C:35-7;

8. Knowingly possess with intent to distribute and/or distribute a controlled dangerous substance, that is cocaine, in violation of N.J.S.A. 2C:35-5a(1), within 500 feet of William Street Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1;

9. Knowingly possess with intent to distribute and/or distribute a controlled dangerous substance, that is marijuana, in violation of N.J.S.A. 2C:35-5a(1), within 500 feet of William Street Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1;

10. Knowingly possess with intent to distribute and/or distribute or dispense drug paraphernalia, knowing that it will be used to plant, propagate, cultivate, grow, harvest, 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;

11. Knowingly did transport or possess 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.

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)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

CHRISTIAN PADILLA

and

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

between on or about May 17, 2016, and on or about October 6,
2016, at the City of Newark, in the County of Essex, 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, 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 FIVE

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

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

CHRISTIAN PADILLA

and

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

on or about July 13, 2016, at the City of Newark, in the County
of Essex, elsewhere, and within the jurisdiction of this Court,
knowingly or purposely did possess with intent to distribute a
controlled dangerous substance, that is, cocaine, contrary to
the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3),
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 - Second Degree)

KIELE LOPEZ AKA "KING FORTY"

between on or about May 17, 2016, and on or about September 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, 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), 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 SEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

between on or about May 23, 2016, and on or about September 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Distribution of a Controlled Dangerous Substance - Third Degree)

LUIS DIAZ AKA "KING STEVIE"

between on or about September 21, 2016, and on or about September 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Distribution of a Controlled Dangerous Substance - Third Degree)

YARITZA PEREZ

on or about June 27, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(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

(Distribution of a Controlled Dangerous Substance - Third Degree)

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

between on or about March 18, 2016, and on or about July 13, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

on or about March 31, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), 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 with Intent to Distribute a Controlled Dangerous
Substance - Third Degree)

KIELE LOPEZ AKA "KING FORTY"

YARITZA PEREZ

VIDALINDA TORRES

AND

JADNIER RIOS AKA JADNIER TORRES

on or about October 6, 2016, at the City of Newark, in the
County of Essex, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did possess with intent to
distribute a controlled dangerous substance, that is, cocaine,
contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A.
2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this
State, the government and dignity of the same.

COUNT THIRTEEN

(Distribution of a Controlled Dangerous Substance - Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

and

VIDALINDA TORRES

between on or about September 21, 2016, and on or about September 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

CHRISTIAN PADILLA

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

LUIS DIAZ AKA "KING STEVIE"

YARITZA PEREZ

VIDALINDA TORRES

and

JADNIER RIOS AKA JADNIER TORRES

between on or about March 18, 2016, and on or about October 6, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II 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 FIFTEEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

and

VIDALINDA TORRES

between on or about March 31, 2016, and on or about September 22, 2016, at the City of Newark, in the County of Essex, 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 SIXTEEN

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

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

CHRISTIAN PADILLA

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

LUIS DIAZ AKA "KING STEVIE"

YARITZA PEREZ

VIDALINDA TORRES

and

JADNIER RIOS AKA JADNIER TORRES

between on or about May 17, 2016, and on or about October 6, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the Ridge Street Early Childhood Center, which is owned by or leased to the Newark 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 SEVENTEEN

(Distribution on or within 1,000 feet of School Property -
Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

and

VIDALINDA TORRES

between on or about September 21, 2016, and on or about
September 22, 2016, at the City of Newark, in the County of
Essex, elsewhere, and within the jurisdiction of this Court,
knowingly or purposely did distribute a controlled dangerous
substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a,
while within 1,000 feet of the Ridge Street Early Childhood
Center, which is owned by or leased to the Newark 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 EIGHTEEN

(Distribution and/or Possession with Intent to Distribute Drug
Paraphernalia - Fourth Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

YARTIZA PEREZ

VIDALINDA TORRES

and

JADNIER RIOS AKA JADNIER TORRES

between on or about May 17, 2016, and on or about October 6,
2016, at the City of Newark, in the County of Essex, elsewhere,
and within the jurisdiction of this Court, knowingly or
purposely did distribute and/or possess with intent to
distribute or dispense drug paraphernalia, knowing that it will
be used to plant, propagate, cultivate, grow, harvest,
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 NINETEEN

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

CHRISTIAN PADILLA

on or about February 12, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, contrary to the provisions of N.J.S.A. 2C:35-5a(1) and N.J.S.A. 2C:35-5b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Possession of a Controlled Dangerous Substance - Third Degree)

CHRISTIAN PADILLA

on or about February 12, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

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

CHRISTIAN PADILLA

on or about February 12, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of Ridge Street Early Childhood Center, which is owned by or leased to the Newark Board of Education and used for school purposes, contrary to the provisions of N.J.S.A. 2C:35-7, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Tampering with Physical Evidence - Fourth Degree)

CHRISTIAN PADILLA

on or about February 12, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, believing that an official proceeding or investigation is pending or about to be instituted, knowingly or purposely alters, destroys, conceals or removes any article, object, record, document or other thing of physical substance with purpose to impair its verity or availability in such proceeding or investigation, that is, the said CHRISTIAN PADILLA did remove and conceal controlled dangerous substances during the execution of a search warrant, 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 TWENTY-THREE

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

CARLOS RODRIGUEZ AKA "KING FUTURE"

between on or about January 27, 2016, and on or about August 26, 2016, at the City of Newark, in the County of Essex, 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 TWENTY-FOUR

(Distribution and/or Possession with Intent to Distribute a
Controlled Dangerous Substance - Second Degree)

CARLOS RODRIGUEZ AKA "KING FUTURE"

between on or about January 27, 2016, and on or about August 26,
2016, at the City of Newark, in the County of Essex, elsewhere,
and within the jurisdiction of this Court, knowingly or
purposely did possess with intent to distribute and/or
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), 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 TWENTY-FIVE

(Possession of a Controlled Dangerous Substance - Third Degree)

CARLOS RODRIGUEZ AKA "KING FUTURE"

between on or about January 27, 2016, and on or about August 26, 2016, at the City of Newark, in the County of Essex, 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 TWENTY-SIX

(Possession of a Weapon in the Course of Committing a Controlled Dangerous Substance Offense - Second Degree)

CARLOS RODRIGUEZ AKA "KING FUTURE"

on or about August 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess a firearm, that is, a Jimenez Arms Model J.A. 22 handgun bearing Serial Number 1209426 and/or a Ruger P95DAO 9mm handgun with a defaced serial number; 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 TWENTY-SEVEN

(Possession of a Defaced Firearm - Fourth Degree)

CARLOS RODRIGUEZ AKA "KING FUTURE"

on or about August 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon or device, that is, a Ruger P95DAO 9mm handgun with a defaced serial number, contrary to the provisions of N.J.S.A. 2C:39-3d, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Money Laundering - Third Degree)

CARLOS RODRIGUEZ AKA "KING FUTURE"

on or about August 26, 2016, at the City of Newark, in the County of Essex, 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 CARLOS RODRIGUEZ AKA "KING FUTURE" did possess approximately \$20,655 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 TWENTY-NINE

(Distribution and/or Possession with Intent to Distribute a
Controlled Dangerous Substance - Third Degree)

ANGELO RODRIGUEZ AKA "TITO"

between on or about July 20, 2016, and on or about August 26,
2016, at the City of Newark, in the County of Essex, elsewhere,
and within the jurisdiction of this Court, knowingly or
purposely did possess with intent to distribute and/or
distribute a controlled dangerous substance, that is, heroin,
contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A.
2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this
State, the government and dignity of the same.

COUNT THIRTY

(Possession of a Controlled Dangerous Substance - Third Degree)

ANGELO RODRIGUEZ AKA "TITO"

between on or about July 20, 2016, and on or about August 26, 2016, at the City of Newark, in the County of Essex, 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 THIRTY-ONE

(Distribution and/or Possession with Intent to Distribute a
Controlled Dangerous Substance - Second Degree)

EDWIN ROMAN III AKA "CHICKEN LITTLE"

between on or about August 22, 2016, and on or about August 26,
2016, at the City of Newark, in the County of Essex, elsewhere,
and within the jurisdiction of this Court, knowingly or
purposely did possess with intent to distribute and/or
distribute a controlled dangerous substance, that is, cocaine,
contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A.
2C:35-5b(2), 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 THIRTY-TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

EDWIN ROMAN III AKA "CHICKEN LITTLE"

between on or about July 20, 2016, and on or about August 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II 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 THIRTY-THREE

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

EDWIN ROMAN III AKA "CHICKEN LITTLE"

on or about August 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(Possession of a Controlled Dangerous Substance - Third Degree)

EDWIN ROMAN III AKA "CHICKEN LITTLE"

on or about August 26, 2016, at the City of Newark, in the County of Essex, 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 THIRTY-FIVE

(Distribution of a Controlled Dangerous Substance - Third Degree)

JOSE D. TORRES AKA "WOP"

and

KEISHA COLON

between on or about August 4 and on or about August 10, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, heroin, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-SIX

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

JOHN J. RUIZ

JOSE D. TORRES AKA "WOP"

and

KEISHA COLON

on or about August 26, 2016, at the City of Newark, in the
County of Essex, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did possess with intent to
distribute a controlled dangerous substance, that is, heroin,
contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A.
2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this
State, the government and dignity of the same.

COUNT THIRTY-SEVEN

(Possession of a Controlled Dangerous Substance - Third Degree)

JOHN J. RUIZ

JOSE D. TORRES AKA "WOP"

and

KEISHA COLON

between on or about March 8, 2016, and on or about August 26, 2016, at the City of Newark, in the County of Essex, 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 THIRTY-EIGHT

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

JOHN J. RUIZ

JOSE D. TORRES AKA "WOP"

and

KEISHA COLON

on or about August 26, 2016, at the City of Newark, in the
County of Essex, elsewhere, and within the jurisdiction of this
Court, knowingly or purposely did possess with intent to
distribute a controlled dangerous substance, that is, cocaine,
contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A.
2C:35-5b(3), and N.J.S.A. 2C:2-6, and against the peace of this
State, the government and dignity of the same.

COUNT THIRTY-NINE

(Possession of a Controlled Dangerous Substance - Third Degree)

JOHN J. RUIZ

JOSE D. TORRES AKA "WOP"

and

KEISHA COLON

on or about August 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II 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 FORTY

(Possession of a Weapon in Course of Committing a Controlled
Dangerous Substance Offense - Second Degree)

JOHN J. RUIZ

JOSE D. TORRES AKA "WOP"

and

KEISHA COLON

on or about August 26, 2016, at the City of Newark, in the
County of Essex, elsewhere, and within the jurisdiction of this
Court, knowingly did possess a firearm, that is, a Silver Short
Arms Model 213 9mm handgun with a defaced serial number and/or
an American bulldog .32 caliber revolver, with no serial number,
while in the course of committing or attempting to commit a
violation of N.J.S.A. 2C:35-5, 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 FORTY-ONE

(Possession of a Defaced Firearm - Fourth Degree)

JOHN J. RUIZ

JOSE D. TORRES AKA "WOP"

and

KEISHA COLON

on or about August 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did have in his/her possession a certain weapon or device, that is, a Silver Short Arms Model 213 9mm handgun with a defaced serial number and/or an American bulldog .32 caliber revolver, with no serial number, contrary to the provisions of N.J.S.A. 2C:39-3d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-TWO

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

JOHN J. RUIZ

JOSE D. TORRES AKA "WOP"

KEISHA COLON

EDWIN ROMAN III AKA "CHICKEN LITTLE"

and

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

between on or about March 8, 2016, and on or about August 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the Branch Brook School, which is owned by or leased to the Newark 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 FORTY-THREE

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

CARLOS RODRIGUEZ AKA "KING FUTURE"

KIELE LOPEZ AKA "KING FORTY"

JOHN J. RUIZ

JOSE D. TORRES AKA "WOP"

KEISHA COLON

EDWIN ROMAN III AKA "CHICKEN LITTLE"

ANGELO RODRIGUEZ AKA "TITO"

and

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

between on or about January 27, 2016, and on or about August 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute and/or distribute a controlled dangerous substance, that is, heroin, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of the Branch Brook School, which is owned by or leased to the Newark 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 FORTY-FOUR

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

EDGARDO MENDEZ AKA "KING ITO"

between on or about August 14, 2016 on or about September 29,
2016, at the Township of Belleville, in the County of Essex,
elsewhere, and within the jurisdiction of this Court, knowingly
or purposely did possess with intent to distribute a controlled
dangerous substance, that is, cocaine, in a quantity of one-half
ounce or more including adulterants or dilutants, contrary to
the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-
5b(2), 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 FORTY-FIVE

(Possession of a Controlled Dangerous Substance - Third Degree)

EDGARDO MENDEZ AKA "KING ITO"

between on or about August 14, 2016 on or about September 29, 2016, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, cocaine, a Schedule II 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 FORTY-SIX

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

EDGARDO MENDEZ AKA "KING ITO"

on or about September 29, 2016, at the Township of Belleville,
in the County of Essex, elsewhere, and within the jurisdiction
of this Court, knowingly or purposely did possess with intent to
distribute a controlled dangerous substance, that is, marijuana,
in a quantity of one ounce or more but less than five pounds
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(11), and
N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT FORTY-SEVEN

(Possession of a Controlled Dangerous Substance - Fourth Degree)

EDGARDO MENDEZ AKA "KING ITO"

on or about September 29, 2016, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, marijuana, in a quantity of more than 50 grams including adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-10a(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FORTY-EIGHT

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

EDGARDO MENDEZ AKA "KING ITO"

between on or about August 14, 2016 on or about September 29, 2016, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of St. Peter's School, which is owned by or leased to the Archdiocese of Newark, 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 FORTY-NINE

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

EDGARDO MENDEZ AKA "KING ITO"

on or about September 29, 2016, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, marijuana, in a quantity of one ounce or more, in violation of N.J.S.A. 2C:35-5a, while within 1,000 feet of St. Peter's School, which is owned by or leased to the Archdiocese of Newark, 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 FIFTY

(Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property - Second Degree)

EDGARDO MENDEZ AKA "KING ITO"

on or about September 29, 2016, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, cocaine, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of William Street Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-ONE

(Possession with Intent to Distribute a Controlled Dangerous Substance on or within 500 feet of a Public Property - Second Degree)

EDGARDO MENDEZ AKA "KING ITO"

on or about September 29, 2016, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess with intent to distribute a controlled dangerous substance, that is, marijuana, in a quantity of one ounce or more, in violation of N.J.S.A. 2C:35-5a, while within 500 feet of William Street Park, a public park, contrary to the provisions of N.J.S.A. 2C:35-7.1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-TWO

(Possession of a Controlled Dangerous Substance - Third Degree)

EDGARDO MENDEZ AKA "KING ITO"

on or about September 29, 2016, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess a controlled dangerous substance, that is, Xanax, a Schedule IV 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 FIFTY-THREE

(Money Laundering - Third Degree)

EDGARDO MENDEZ AKA "KING ITO"

on or about September 29, 2016, at the Township of Belleville, in the County of Essex, 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 EDGARDO MENDEZ AKA "KING ITO" did possess approximately \$3,000 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 FIFTY-FOUR

(Conspiracy - Second Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

ISRAEL CARRERAS AKA "KING SOLLE"

JULIO BENABE AKA "KING COCO"

and

CARLOS RODRIGUEZ AKA "KING FUTURE"

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, on or about May 5, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of robbery, aggravated assault, criminal restraint, and possession of a weapon for an unlawful purpose, did agree that:

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

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

1. In the course of committing a theft or attempting to commit a theft, knowingly did inflict bodily injury upon L.M.

and/or did use force upon L.M. and/or did threaten L.M. with immediate bodily injury and/or did put L.M. in fear of immediate bodily injury, while armed with a deadly weapon, and/or did use or threaten the immediate use of a deadly weapon, contrary to the provisions of N.J.S.A. 2C:15-1a(1), N.J.S.A. 2C:15-1a(2) and N.J.S.A. 2C:15-1b;

2. Knowingly possess a firearm with a purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a(1);

3. Knowingly or purposely cause or attempt to cause bodily injury to another with a deadly weapon, or knowingly or purposely cause or attempt to cause significant bodily injury to another, contrary to the provisions of N.J.S.A. 2C:12-1b(2) and N.J.S.A. 2C:12-1b(7); and

4. Knowingly restrain another unlawfully in circumstances exposing the other to risk of serious bodily injury, contrary to the provisions of N.J.S.A. 2C:13-2.

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 FIFTY-FIVE

(Robbery - First Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

JULIO BENABE AKA "KING COCO"

and

ISRAEL CARRERAS AKA "KING SOLLE"

on or about May 5, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft or attempting to commit a theft, knowingly did inflict bodily injury or use force upon L.M. and/or did threaten immediate bodily injury to L.M., while armed with, and/or did use or threaten the immediate use of a deadly weapon, contrary to the provisions of N.J.S.A. 2C:15-1a(1), N.J.S.A. 2C:15-1a(2), N.J.S.A. 2C:15-1b, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SIX

(Possession of a Weapon for an Unlawful Purpose - Second Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

JULIO BENABE AKA "KING COCO"

and

ISRAEL CARRERAS AKA "KING SOLLE"

on or about May 5, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, 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(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-SEVEN

(Aggravated Assault - Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

ISRAEL CARRERAS AKA "KING SOLLE"

JULIO BENABE AKA "KING COCO"

and

CARLOS RODRIGUEZ AKA "KING FUTURE"

on or about May 5, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did attempt to cause bodily injury to L.M. with a deadly weapon, or knowingly or purposely did cause or attempt to cause significant bodily injury to L.M., contrary to the provisions of N.J.S.A. 2C:12-1b(2), 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 FIFTY-EIGHT

(Criminal Restraint - Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

JUSTIN RODRIGUEZ AKA "KING JAY AIRY"

ISRAEL CARRERAS AKA "KING SOLLE"

JULIO BENABE AKA "KING COCO"

and

CARLOS RODRIGUEZ AKA "KING FUTURE"

on or about May 5, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did restrain L.M. unlawfully in circumstances exposing L.M. to risk of serious bodily injury, contrary to the provisions of N.J.S.A. 2C:13-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTY-NINE

(Conspiracy - Second Degree)

JAPHET LOPEZ AKA "KING JAPHET"

and

KIELE LOPEZ AKA "KING FORTY"

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, between on or about March 7, 2017, and on or about May 12, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of witness tampering, and hindering apprehension did agree that:

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

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

1. Believing that an official proceeding or investigation is pending or about to be instituted or has been instituted, knowingly employ force or threat of force which a reasonable person would believe would cause a witness or informant to testify or inform falsely, withhold any testimony, information, document or thing, elude legal process summoning

him to testify or supply evidence, absent himself from any proceeding or investigation to which he has been legally summoned, or otherwise obstruct, delay, prevent or impede an official proceeding or investigation, and said conduct occurred in connection with an official proceeding or investigation of the crime(s) of robbery in violation of N.J.S.A. 2C:15-1 and/or aggravated assault in violation of N.J.S.A. 2C:12-1 and/or first degree racketeering in violation of N.J.S.A. 2C:41-2, contrary to the provisions of N.J.S.A. 2C:28-5; and/or

2. With purpose to hinder his own detention, apprehension, investigation, prosecution, conviction or punishment for an offense or violation of Title 39 of the Revised Statutes knowingly prevents or obstructs or attempts to prevent or obstruct by means of force, intimidation or deception any witness or informant from providing testimony or information, regardless of its admissibility, which might aid in his discovery or apprehension or in the lodging of a charge against him, contrary to the provisions of N.J.S.A. 2C:29-3b(3).

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 SIXTY

(Witness Tampering - First Degree)

JAPHET LOPEZ AKA "KING JAPHET"

and

KIELE LOPEZ AKA "KING FORTY"

between on or about March 7, 2017, and on or about May 12, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, believing that an official proceeding or investigation is pending or about to be instituted or has been instituted, did knowingly employ force or threat of force against B.L. which a reasonable person would believe would cause B.L. to testify or inform falsely, withhold any testimony, information, document or thing, elude legal process summoning him to testify or supply evidence, absent himself from any proceeding or investigation to which he has been legally summoned, or otherwise obstruct, delay, prevent or impede an official proceeding or investigation, and said conduct occurred in connection with an official proceeding or investigation of the crime(s) of robbery in violation of N.J.S.A. 2C:15-1 and/or aggravated assault in violation of N.J.S.A. 2C:12-1 and/or first degree racketeering in violation of N.J.S.A. 2C:41-2, contrary to the provisions of N.J.S.A. 2C:28-5 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-ONE

(Hindering Prosecution - Second Degree)

JAPHET LOPEZ AKA "KING JAPHET"

and

KIELE LOPEZ AKA "KING FORTY"

between on or about March 7, 2017, and on or about May 12, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to hinder his own detention, apprehension, investigation, prosecution, conviction or punishment for an offense or violation of Title 39 of the Revised Statutes did knowingly prevent or obstruct or attempt to prevent or obstruct by means of force, intimidation or deception B.L. from providing testimony or information, regardless of its admissibility, which might aid in his discovery or apprehension or in the lodging of a charge against him, contrary to the provisions of N.J.S.A. 2C:29-3b(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-TWO

(Terroristic Threats - Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

on or about May 12, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did threaten to commit a crime a violence with the purpose to terrorize B.L. and/or knowingly did threaten to kill B.L. with the purpose to put B.L. in imminent fear of death under circumstances reasonably causing B.L. to believe the immediacy of the threat the likelihood that it will be carried out, contrary to the provisions of N.J.S.A. 2C:12-3a and N.J.S.A. 2C:12-3b, and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-THREE

(Conspiracy - Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

CHRISTOPHER VELEZ AKA "BOXING CHRIS"

CARLOS RODRIGUEZ AKA "KING FUTURE"

and

LUIS MALDONADO AKA "KING SANTO"

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, between on or about October 1, 2015, and on or about August 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of aggravated assault did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforementioned crime, or

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

1. Knowingly or purposely cause or attempt to cause significant bodily injury to another, contrary to the provisions of N.J.S.A. 2C:12-1b(7).

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 SIXTY-FOUR

(Aggravated Assault - Third Degree)

JAPHET LOPEZ AKA "KING JAPHET"

KIELE LOPEZ AKA "KING FORTY"

CHRISTOPHER VELEZ AKA "BOXING CHRIS"

CARLOS RODRIGUEZ AKA "KING FUTURE"

and

LUIS MALDONADO AKA "KING SANTO"

between on or about October 1, 2015, and on or about August 22, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did cause or attempt to cause significant bodily injury to another, 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 SIXTY-FIVE

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

CARLOS RODRIGUEZ AKA "KING FUTURE"

on or about August 26, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Burglary on Union County Indictment 08-04-00280-I, did purchase, own, possess or control a firearm, that is, a Jimenez Arms Model J.A. 22 handgun bearing Serial Number 1209426 and/or a Ruger P95DAO 9mm handgun with a defaced serial number, 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.

A TRUE BILL:

Carla Murphy

Foreperson

Deputy

Dated: 7/13/17

Elie Honig

AAG Elie Honig

Director

Division of Criminal Justice

FILED

JUL 13 2017

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ704-17-1

Superior Court 17-07-00123 S
Docket Number

STATE OF NEW JERSEY)

v.)

JAPHET LOPEZ)
also known as)
"KING JAPHET")

ORDER OF VENUE

KIELE LOPEZ)
also known as)
"KING FORTY")

CARLOS RODRIGUEZ)
also known as)
"KING FUTURE")

JUSTIN RODRIGUEZ)
also known as)
"KING JAY AIRY")

ISRAEL CARRERAS)
also known as)
"KING SOLLE")

JULIO BENABE)
also known as)
"KING COCO")

CHRISTOPHER VELEZ)
also known as)
"BOXING CHRIS")

LUIS MALDONADO)
also known as)
"KING SANTO")

EDGARDO MENDEZ)
also known as)
"KING ITO")

LUIS DIAZ)
also known as)
"KING STEVIE")

ANGELO RODRIGUEZ)
also known as)
"TITO")

JOSE D. TORRES)
also known as)
"WOP")

EDWIN ROMAN III)
also known as)
"CHICKEN LITTLE")

JOHN J. RUIZ)

CHRISTIAN PADILLA)

YARITZA PEREZ)

KEISHA COLON)

VIDALINDA TORRES)

and)

JADNIER RIOS)
also known as)
"JADNIER TORRES")

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

IT IS ORDERED on this 13th day of July, 2017,
pursuant to paragraph 8 of the State Grand Jury Act, that the

County of Essex 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 Essex for filing.



Peter E. Warshaw, P.J.S.C.