FILED
JUL 27 2017
State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury Number <u>SGJ704-17-4</u>

Superior Court

Docket Number 17 - 0 7 - 0 0 1 2 7 \$

STATE OF NEW JERSEY)	
V.)	ORDER OF VENUE
JONATHAN VEGA)	
KELVIN VEGA)	
CARLOS SANCHEZ)	
and)	
BILAL CURETON)	

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

IT IS ORDERED on this 27 day of Jul), 2017, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Morris 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 Morris for filing.

Robert C. Billmeier, J.S.C

PJ.C.

FILED JUL 27 2017 State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ704-17-4
Superior Court

Docket Number 17-07-00127 \$

STATE OF NEW JERSEY)
V .)
JONATHAN VEGA)
KELVIN VEGA)
CARLOS SANCHEZ)
AND)
BILAL CURETON)

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

COUNT ONE

(Conspiracy - Second Degree)

JONATHAN VEGA

KELVIN VEGA

CARLOS SANCHEZ

AND

BILAL CURETON

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about November 1, 2016 and on or about May 24,

2017, at the Township of Long Hill, at the Township of Morristown, both in the County of Morris, at the Township of Livingston, at the Town of Irvington, at the City of Newark, all in the County of Essex, at the Town of Mahwah, at the Borough of Closter, both in the County of Bergen, at the Borough of Jamesburg, in the County of Middlesex, at the Township of Holmdel, in the County of Monmouth, at the City of Elizabeth, in the County of Union, in the State of New York; in the State of Louisiana, in the State of Ohio, in the State of Maryland, 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, Fencing-Dealing in Stolen Property, Receiving Stolen Property, Theft by Unlawful Taking, and Burglary, did agree together and with persons known to the Grand Jurors who were acting at the direction of law enforcement that:

- A. One of more of them would knowingly engage in conduct which would constitute the aforesaid crimes; or
- B. One or more of them would knowingly aid in the planning, solicitation or commission of said crimes, that is:
- 1. Financial Facilitation- one or more of them did knowingly or purposely transport or possess property known, or which a reasonable person would believe to be, derived from criminal activity, with a value in excess of \$75,000.00, or to engage in transactions involving such property with the intent to 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. Fencing-Dealing in Stolen Property- one or more of them did knowingly or purposely traffic in, or initiate organize, plan, finance, direct, manage, or supervise the trafficking in stolen property having a value in excess of \$75,000.00, contrary to the provisions of N.J.S.A. 2C:20-7.1(b); and
- 3. Receiving Stolen Property- one or more of them did knowingly or purposely commit theft by receiving or bringing into this State moveable property of another having a 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
- 4. Theft by Unlawful Taking-one or more of them did knowingly or purposely unlawfully exercise control over moveable property of another, having a value in excess of \$75,000.00 with purpose to deprive the owners thereof, contrary to the provisions of N.J.S.A. 2C:20-3a; and
- 5. Burglary-one or more of them did knowingly or purposely enter a motor vehicle with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2a(1); and

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

(Financial Facilitation of Criminal Activity - Second Degree)

KELVIN VEGA

JONATHAN VEGA

CARLOS SANCHEZ

AND

BILAL CURETON

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about November 1, 2016 and on or about May 24, 2017, at the Township of Long Hill, at the Township of Morristown, both in the County of Morris, at the Township of Livingston, at the Town of Irvington, at the City of Newark, all in the County of Essex, at the Town of Mahwah, at the Borough of Closter, both in the County of Bergen, at the Borough of Jamesburg, in the County of Middlesex, at the Township of Holmdel, in the County of Monmouth, at the City of Elizabeth, in the County of Union, in the State of New York; in the State of Louisiana, in the State of Ohio, in the State of Maryland, elsewhere, and within the jurisdiction of this Court, did commit the offense of financial facilitation of criminal activity, in that, the said KELVIN VEGA, JONATHAN VEGA, CARLOS SANCHEZ AND BILAL CURETON 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 a value in excess of \$75,000.00, or did engage in

transactions involving such property with the intent to facilitate 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

(Fencing-Dealing in Stolen Property - Second Degree)

JONATHAN VEGA

KELVIN VEGA

CARLOS SANCHEZ

AND

BILAL CURETON

and other persons whose identities are known and unknown to the Grand Jurors, between on or about November 1, 2016 and on or about May 24, 2017, at the Township of Long Hill, at the Township of Morristown, both in the County of Morris, at the Township of Livingston, at the Town of Irvington, at the City of Newark, all in the County of Essex, at the Town of Mahwah, at the Borough of Closter, both in the County of Bergen, at the Borough of Jamesburg, in the County of Middlesex, at the Township of Holmdel, in the County of Monmouth, at the City of Elizabeth, in the County of Union, in the State of New York; in the State of Louisiana, in the State of Ohio, in the State of Maryland, elsewhere, and within the jurisdiction of this Court, did traffic in, or initiate, organize, plan, finance, direct, manage, or supervise the trafficking in stolen motor vehicles having a 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:2-6, N.J.S.A. 2C:20-2, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Receiving Stolen Property - Second Degree)

JONATHAN VEGA

KELVIN VEGA

CARLOS SANCHEZ

AND

BILAL CURETON

and other persons whose identities are known and unknown to the Grand Jurors, between on or about November 1, 2016 and on or about May 24, 2017, at the Township of Long Hill, at the Township of Morristown, both in the County of Morris, at the Township of Livingston, at the Town of Irvington, at the City of Newark, all in the County of Essex, at the Town of Mahwah, at the Borough of Closter, both in the County of Bergen, at the Borough of Jamesburg, in the County of Middlesex, at the Township of Holmdel, in the County of Monmouth, at the City of Elizabeth, in the County of Union, in the State of New York; in the State of Louisiana, in the State of Ohio, in the State of Maryland, 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, motor vehicles, having a value in excess of \$75,000.00, knowing the same to be stolen or believing that they had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7, N.J.S.A. 2C:20-2, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Theft by Unlawful Taking - Second Degree)

JONATHAN VEGA

KELVIN VEGA

CARLOS SANCHEZ

AND

BILAL CURETON

and other persons whose identities are known and unknown to the Grand Jurors, between on or about November 1, 2016, and on or about May 24, 2017, at the Township of Long Hill, at the Township of Morristown, both in the County of Morris, at the Township of Livingston, at the Town of Irvington, at the City of Newark, all in the County of Essex, at the Town of Mahwah, at the Borough of Closter, both in the County of Bergen, at the Borough of Jamesburg, in the County of Middlesex, at the Township of Holmdel, in the County of Monmouth, at the City of Elizabeth, in the County of Union, in the State of New York; in the State of Louisiana, in the State of Ohio, in the State of Maryland, elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise control over moveable property of others, that is motor vehicles, having a value in excess of \$75,000.00, with 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, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Burglary - Third Degree)

JONATHAN VEGA

KELVIN VEGA

CARLOS SANCHEZ

AND

BILAL CURETON

and other persons whose identities are known and unknown to the Grand Jurors between on or about November 1, 2016, and on or about May 24, 2017, at the Township of Long Hill, at the Township of Morristown, both in the County of Morris, at the Township of Livingston, at the Town of Irvington, at the City of Newark, all in the County of Essex, at the Town of Mahwah, at the Borough of Closter, both in the County of Bergen, at the Borough of Jamesburg, in the County of Middlesex, at the Township of Holmdel, in the County of Monmouth, at the City of Elizabeth, in the County of Union, in the State of New York; in the State of Louisiana, in the State of Ohio, in the State of Maryland, elsewhere, and within the jurisdiction of this Court, knowingly did enter a motor vehicle or motor vehicles with the purpose to commit an offense therein, contrary to the provisions of N.J.S.A. 2C:18-2a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Attempted Theft By Unlawful Taking-Third Degree)

BILAL CURETON

on or about March 7, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did attempt to unlawfully take or exercise control over moveable property of an another, that is a motor vehicle, having a value in excess of \$500.00, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:5-1, N.J.S.A. 2C:20-3a, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

Jil S. Mayer, Deputy Director Division of Criminal Justice

True Bill:

Foreperson

Dated.