

**SUPERIOR COURT OF N.J.**

**REC'D**

**OCT 28 2002**

**DONALD E. PHELAN  
CLERK**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ465-02-8(9)

Superior Court  
Docket Number 02-10-00180-S

STATE OF NEW JERSEY )

v. )

ADAM ROMAN )  
also known as )  
KING ADAM )

INDICTMENT

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

COUNT ONE

(Racketeering Conspiracy - First Degree)

ADAM ROMAN

who is named as a defendant herein, and other persons whose identities are known to the Grand Jurors, who are named as co-conspirators but not as defendants herein, at the times and places hereinafter specified, with the purpose of promoting and facilitating the commission of the crime of racketeering, did conspire, confederate and agree together that:

A. One or more of them would engage in conduct which would constitute the crime of racketeering; or

B. One or more of them would aid in the planning, solicitation and commission of the crime of racketeering, that is, the defendant and the unindicted co-conspirators, being persons employed by and associated with an enterprise, which

enterprise was engaged in and the activities of which affected trade and commerce, would conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, in violation of N.J.S.A. 2C:41-2c, all as hereinafter described.

#### The Relevant Times and Places

1. The conspiracy occurred between in or about June 2001, and on or about May 23, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court.

#### The Enterprise

2. ADAM ROMAN and other persons whose identities are known and unknown to the Grand Jurors, would constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, which enterprise was a faction of the Newark Chapter of the Almighty Latin King/Queen Nation, Inc.

#### The Pattern of Racketeering Activity

3. The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, would consist of at least two incidents of racketeering conduct, including Kidnapping (N.J.S.A. 2C:13-1), Possession of a Weapon for an Unlawful Purpose (N.J.S.A. 2C:39-4), Robbery (N.J.S.A. 2C:15-1), Theft by Extortion (N.J.S.A. 2C:20-5), Unlawful Disposition of a Weapon (N.J.S.A. 2C:39-9), Maintaining or Operating a Controlled Dangerous Substance

Production Facility (N.J.S.A. 2C:35-4), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Receiving Stolen Property (N.J.S.A. 2C:20-7), and Fencing (N.J.S.A. 2C:20-7.1), all as defined in Counts Four, Five, Seven, Nine, Ten, Twelve, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Twenty-Two, Twenty-Three, Twenty-Four and Twenty-Five of this Indictment.

All in violation of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:41-2d, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Racketeering - First Degree)

ADAM ROMAN

between in or about June 2001, and on or about May 23, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, did knowingly or purposely commit the crime of racketeering, that is, the defendant and other persons employed by and associated with an enterprise engaged in and the activities of which affected trade and commerce, did conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity as hereinafter described.

The Enterprise

ADAM ROMAN, and other persons whose identities are known and unknown to the Grand Jurors, did constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, which enterprise was a faction of the Newark Chapter of the Almighty Latin King/Queen Nation, Inc.

The Pattern of Racketeering Activity

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, did consist of at least two incidents of racketeering conduct, including Kidnapping (N.J.S.A. 2C:13-1), Possession of a Weapon for an Unlawful Purpose (N.J.S.A. 2C:39-4), Robbery (N.J.S.A. 2C:15-1), Theft by Extortion (N.J.S.A. 2C:20-5),

Unlawful Disposition of a Weapon (N.J.S.A. 2C:39-9), Maintaining or Operating a Controlled Dangerous Substance Production Facility (N.J.S.A. 2C:35-4), Distribution of a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Possession with Intent to Distribute a Controlled Dangerous Substance (N.J.S.A. 2C:35-5), Receiving Stolen Property (N.J.S.A. 2C:20-7), and Fencing (N.J.S.A. 2C:20-7.1), all as defined in Counts Four, Five, Seven, Nine, Ten, Twelve, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Twenty-Two, Twenty-Three, Twenty-Four and Twenty-Five of this Indictment.

ADAM ROMAN

did commit the racketeering conduct of Kidnapping, Possession of a Weapon for an Unlawful Purpose, Robbery, Theft by Extortion, Unlawful Disposition of a Weapon, Distribution of a Controlled Dangerous Substance, Possession with Intent to Distribute a Controlled Dangerous Substance, Receiving Stolen Property, and Fencing, all of which racketeering conduct is defined in Counts Four, Five, Seven, Nine, Ten, Twelve, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Twenty-Two, Twenty-Three, Twenty-Four and Twenty-Five of this Indictment.

All contrary to the provisions of N.J.S.A. 2C:41-2c and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Leader of Organized Crime - Second Degree)

ADAM ROMAN

between in or about June 2001, and on about May 23, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, was a leader of organized crime, in that the said ADAM ROMAN, purposely did conspire with other persons whose identities are known and unknown to the Grand Jurors, who comprised an illegal enterprise of individuals associated in fact, which was a faction of the Newark Chapter of the Almighty Latin King/Queen Nation, as an organizer, supervisor and manager, to commit a continuing series of crimes which would constitute a pattern of racketeering activity, pursuant to the provisions of N.J.S.A. 2C:41-1a and d, all of which is described in Counts One and Two of this Indictment and is incorporated herein by reference, contrary to the provisions of N.J.S.A. 2C:5-2g, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Kidnapping - First Degree)

ADAM ROMAN

on or about May 23, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, unlawfully did remove Pedro Familia a substantial distance from the vicinity where he was found, with purpose to facilitate the commission of a crime or flight thereafter, or to inflict bodily injury on or to terrorize the said Pedro Familia, contrary to the provisions of N.J.S.A. 2C:13-1b and 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 Extortion - Second Degree)

ADAM ROMAN

on or about May 23, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, did purposely and unlawfully obtain the property of another by extortion, that is, by purposely threatening bodily injury to Pedro Familia, or by confining or restraining Pedro Familia until U.S. Currency was obtained, contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT SIX

(Terroristic Threats - Third Degree)

ADAM ROMAN

on or about May 23, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, did threaten to kill Pedro Familia with purpose to put him in imminent fear of death under circumstances reasonably causing the victim to believe the immediacy of the threat and the likelihood that it will be carried out, contrary to the provisions of N.J.S.A. 2C:12-3b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

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

ADAM ROMAN

on or about May 23, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly or purposely did possess a certain weapons, that is, firearms, with the purpose to use them unlawfully against another, that is, to commit the crime of terroristic threats in violation of N.J.S.A. 2C:12-3 against Pedro Familia, contrary to the provisions of N.J.S.A. 2C:39-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Tampering with a Witness or Informant - Second Degree)

ADAM ROMAN

on or about May 23, 2002, 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 was pending or about to be instituted, knowingly or purposely attempted to cause a witness or informant, namely, Pedro Familia, to withhold testimony or information, by employing force or threat of force, contrary to the provisions of N.J.S.A. 2C:28-5a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Robbery - Second Degree)

ADAM ROMAN

on or about February 28, 2002, 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 from Maria Correia, did purposely use force upon Maria Correia and put her in fear of immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-1a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Theft by Extortion - Second Degree)

ADAM ROMAN

between on or about February 27, 2002, and on or about February 28, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, did purposely and unlawfully obtain the property of another by extortion, that is by purposely threatening bodily injury to Maria Correia, or by confining her until she turned over property belonging to her, contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Terroristic Threats - Third Degree)

ADAM ROMAN

on or about February 27, 2002, at the City of Newark, County of Essex, elsewhere and within the jurisdiction of this Court, with the purpose to terrorize Maria Correia, or in reckless disregard of the risk of causing such terror, did call her on the telephone and leave a message in which he threatened to put her and her family in the hospital if she did not pay him U.S. Currency, contrary to the provisions of N.J.S.A. 2C:12-3a, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Distribution of a Controlled  
Dangerous Substance-Second Degree)

ADAM ROMAN

between on or about February 13, 2002, and on or about March 6, 2002, 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 in the aggregate including any adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Unlawful Disposition of a Weapon - Fourth Degree)

ADAM ROMAN

on or about February 13, 2002, in the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly or purposely did dispose of a .25 caliber "Raven Arms" semi-automatic handgun, bearing serial number 755049, without having first been licensed or registered to do so as provided by N.J.S.A. 2C:58-1 et seq., contrary to the provisions of N.J.S.A. 2C:39-9d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.



COUNT FOURTEEN

(Unlawful Disposition of a Weapon - Fourth Degree)

ADAM ROMAN

on or about March 6, 2002, in the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly or purposely did dispose of a Ruger semi-automatic rifle, bearing serial number 18121624, without having first been licensed or registered to do so as provided by N.J.S.A. 2C:58-1 et seq., contrary to the provisions of N.J.S.A. 2C:39-9d and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT FIFTEEN

(Unlawful Disposition of an Assault Firearm - Third Degree)

ADAM ROMAN

on or about March 6, 2002, in the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly or purposely did dispose of an assault firearm, that is, a Norinco semi-automatic rifle, bearing serial number 7-1818804, without having first been licensed or registered to do so as provided by N.J.S.A. 2C:58-1 et seq., contrary to the provisions of N.J.S.A. 2C:39-9g and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT SIXTEEN

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

ADAM ROMAN

between on or about August 30, 2001, and on or about March 6, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly did aid, promote, finance and otherwise participate in the maintenance or operation of a premises, place of facility used for the manufacture of cocaine, a Schedule II controlled dangerous substance, contrary to the provisions of N.J.S.A. 2C:35-4, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Distribution of a Controlled Dangerous  
Substance-Second Degree)

ADAM ROMAN

between on or about August 30, 2001, and on or about March 6, 2002, 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 more than one-half ounce 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) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

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

ADAM ROMAN

between on or about August 30, 2001, and on or about March 6, 2002, 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 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) 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 of a Controlled Dangerous  
Substance-Third Degree)

ADAM ROMAN

between on or about August 30, 2001, and on or about March 6, 2002, 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 TWENTY

(Possession of a Weapon During the Commission of a Controlled Dangerous Substance Offense-Second Degree)

Adam Roman

on or about March 6, 2002, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly did possess a weapon, that is, a Tanfoglio .9 millimeter handgun, with a defaced serial number, while in the course of committing, attempting to commit or while engaged in a violation of the provisions of N.J.S.A. 2C:35-5, contrary to the provisions of N.J.S.A. 2C:39-4.1a, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Possession of a Prohibited Weapon - Fourth Degree)

ADAM ROMAN

on or about February 6, 2000, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly and purposely did possess a firearm, that is, a Tanfoglio .9 millimeter handgun, with a defaced 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 TWENTY-TWO

(Receiving Stolen Property - Second Degree)

ADAM ROMAN

between on or about November 19, 2001, and on or about December 28, 2001, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly or purposely did commit theft by knowingly receiving or bringing into the State movable property of others, that is: a 1989 Toyota Camry, VIN JT2VV22E4K0036006, the property of Manual Vargas having an approximate value of \$3,825; a 2001 BMW Coupe, VIN WBABN53451JU21968, the property of Joel W. Goodman having an approximate value of \$30,070; a 2002 Lexus Sedan, VIN JTHBF30G825006266, the property of Kathirina Faller having an approximate value of \$30,000; a 1999 Lexus 300SC, VIN JT8CD32Z4X1006627, the property of Toyota Credit Motor Company having an approximate value of \$37,325; a 1998 Lincoln Town Car, VIN 1LNFM81W9W4652900, the property of Azam Khan having an approximate value of \$28,175; with the above referenced removable property having an aggregate value of approximately \$129,390, 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 the State, the government and dignity of the same.

COUNT TWENTY-THREE

(Fencing - Second Degree)

ADAM ROMAN

between on or about November 19, 2001, and on or about December 28, 2001, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, did knowingly and purposely traffic in, initiate, organize, plan, finance, direct, manage, or supervise trafficking in stolen property, having an aggregate value of \$75,000 or more, that is a 1989 Toyota Camry, a 2001 BMW Coupe, a 2002 Lexus Sedan, a 1999 Lexus Coupe, and a 1998 Lincoln Town Car, all as more particularly described in Count Twenty-Three of this Indictment, having an aggregate value of approximately \$129,390, contrary to the provisions of N.J.S.A. 2C:20-7.1b 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 of a Controlled Dangerous  
Substance-Second Degree)

ADAM ROMAN

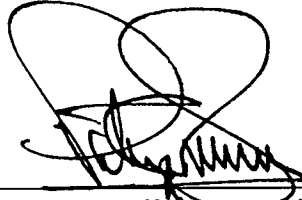
on or about November 19, 2001, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly or purposely did distribute a controlled dangerous substance, that is, cocaine in a quantity of more than one-half ounce including adulterants or dilutants, contrary to the provisions of N.J.S.A. 2C:35-5a(1), N.J.S.A. 2C:35-5b(2) 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

(Unlawful Possession of a Weapon by Certain Persons Not to Have Weapons-Second Degree)

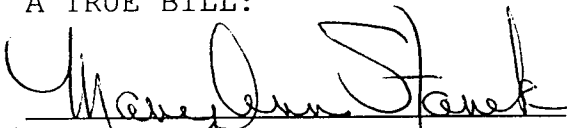
ADAM ROMAN

on or about March 6, 2002, 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 aggravated assault, in the State of New Jersey, County of Essex, Indictment 1999-02-00655, did knowingly possess a Tanfoglio .9 millimeter handgun, with a defaced serial number, contrary to the provisions of N.J.S.A. 2C:39-7, and against the peace of this State, the government and dignity of the same.



\_\_\_\_\_  
Peter C. Harvey, F.A.A.G.  
Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
, Foreperson

Dated: 10/25/02