

NOVEMBER 5, 2021

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ763-21-8  
Superior Court  
Docket Number 21-11-164-S

STATE OF NEW JERSEY	)
	)
v.	)
	)
REYFY GONZALEZ	)
	)
TAINA PEREZ	)
	)
JOSE M. IRIZARRY	)
	)
RICARDO ACEVEDO	)
	)
ANDY A. MAZARA	)
	)
TIRSON RUIZ	)
	)
ALVARO J. ALVAREZ-CAPIO	)
	)
WILLIE ANTONIO SAMUEL-BALDAYAQUEZ	)
	)
AND	)
	)
GUILLERMO CRUZ-GUERRERO	)

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

COUNT ONE

(Conspiracy - Second Degree)

REYFY GONZALEZ

TAINA PEREZ

JOSE M. IRIZARRY

RICARDO ACEVEDO

ANDY A. MAZARA

TIRSON RUIZ

ALVARO J. ALVAREZ-CAPIO

WILLIE ANTONIO SAMUEL-BALDAYAQUEZ

AND

GUILLERMO CRUZ-GUERRERO

who are named as defendants herein, 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 February 27, 2017, and on or about September 13, 2019, at the Borough of Fort Lee, at the City of Paramus, at the Borough of Wallington, at the Borough of Oakland, at the City of Englewood, all in the County of Bergen, at the City of Jersey City, at the City of North Bergen, all in the County of Hudson, at the Township of Washington, in the County of Gloucester, at the Township of Belleville, in the County of Essex, at the Township of Hillside, in the County of Union, at the Borough of Somerville, at the Township of Green Brook, all in the County of Somerset, at the Town of Princeton, at the Township of Hamilton, at the City of Trenton, all in the County of Mercer, at the Township of East Brunswick, in the County of Middlesex, at the Township of Parsippany-Troy Hills, in the

County of Morris, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Receiving Stolen Property, Use of Personal Identifying Information of Another, Tampering with Public Records or Information, Theft by Deception, Impersonation, and Fencing - Dealing in Stolen Property, did agree together that:

A. One or 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. Receiving Stolen Property: 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; and,

2. Use of Personal Identifying Information of Another: in obtaining or attempting to obtain a driver's license, birth certificate or other document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, that person knowingly exhibits, displays or utters a document or other writing which falsely purports to be a driver's license, birth

certificate or other document issued by a governmental agency or which belongs or pertains to a person other than the person who possesses the document, contrary to the provisions of N.J.S.A. 2C:21-17.2(A); and

3. Tampering with Information or Public Record: with the purpose to defraud or injure anyone, knowingly make, present, offer for filing, or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7A(2); and

4. Theft by Deception: purposely obtain property of another by deception, contrary to the provisions of N.J.S.A. 2C:20-4; and

5. Impersonation: purposely impersonate another or assume a false identity and do an act in such assumed character or false identity for the purpose of obtaining a benefit for himself or another or to injure or defraud another, contrary to the provisions of N.J.S.A. 2C:21-17(a)(1); and

6. Fencing - Dealing in Stolen Property: 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).

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

(Receiving Stolen Property - Second Degree)

REYFY GONZALEZ

between on or about March 13, 2019, and on or about July 25, 2019, at the Borough of Fort Lee, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, did commit theft by knowingly receiving or bringing into this State moveable property of 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 THREE

(Use of Personal Identifying Information  
of Another - Second Degree)

TAINA PEREZ

on or about July 24, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly exhibit, display, or utter a document or other writing which belongs or pertains to a person other than the person who possesses the document, that is, a Puerto Rico Driver's License, birth certificate, social security card, and bill in the name of "E.M.R.-V.," whose identity is known by the Grand Jury, in obtaining a document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, that is, a New Jersey Digital Driver's License, contrary to the provisions of N.J.S.A. 2C:21-17.2, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

TAINA PEREZ

on or about July 24, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an application for a New Jersey Digital Driver's License, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Theft by Deception - Second Degree)

TAINA PEREZ

between on or about September 18, 2018, and on or about October 12, 2018, at the City of Jersey City, in the County of Hudson, at the City of Paramus, in the County of Bergen, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of another, having an aggregate value in excess of \$75,000, by deception, that is, the said TAINA PEREZ purposely did steal motor vehicles and/or watercraft by impersonating "E.M.R.-V.," whose identity is known to the grand jurors, and submitting fraudulent purchase agreements and a fictitious New Jersey Digital Driver's License to car dealerships, thereby creating or reinforcing a false impression to the dealerships as to her identity, and the validity of the purchase agreements and the New Jersey Digital Driver's License;

WHEREAS IN TRUTH AND IN FACT, as the said TAINA PEREZ then and there well knew, she was not "E.M.R.-V." and the New Jersey Digital Driver's License and purchase agreements were not legitimate, and said TAINA PEREZ, did not intend to pay for the motor vehicles and/or watercraft, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of

the same.

COUNT SIX

(Impersonation - Second Degree)

TAINA PEREZ

between on or about September 18, 2018, and on or about October 12, 2018, at the City of Jersey City, in the County of Hudson, at the City of Paramus, in the County of Bergen, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for herself or another in an amount of \$75,000 or more, or to injure or defraud another, did impersonate another or assume a false identity and did acts in such assumed character or false identity, that is, the said TAINA PEREZ did impersonate or assume the identity of "E.M.R.-V.," whose identity is known to the grand jurors, and fraudulently purchased vehicles and/or watercraft in her name, with an aggregate value in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:21-17(a)(1) and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Use of Personal Identifying Information  
of Another - Second Degree)

JOSE IRIZARRY

on or about September 24, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly exhibit, display, or utter a document or other writing which belongs or pertains to a person other than the person who possesses the document, that is, a Puerto Rico Driver's License, birth certificate, social security card, and an ATM card in the name of "E.E.C.-A.," whose identity is known by the Grand Jury, in obtaining a document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, that is, a New Jersey Digital Driver's License, contrary to the provisions of N.J.S.A. 2C:21-17.2, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Tampering with Public Records or Information - Third Degree)

JOSE IRIZARRY

on or about September 24, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an application for a New Jersey Digital Driver's License, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Theft by Deception - Second Degree)

JOSE IRIZARRY

between on or about September 27, 2018, and on or about November 29, 2018, at the Township of Parsippany-Troy Hills, in the County of Morris, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of another, having an aggregate value in excess of \$75,000, by deception, that is, the said JOSE IRIZARRY purposely did steal motor vehicles by impersonating "E.E.C.-A.," whose identity is known to the grand jurors, and submitting fraudulent purchase agreements and a fictitious New Jersey Digital Driver's License to car dealerships, thereby creating or reinforcing a false impression to the dealerships as to his identity, and the validity of the purchase agreement and the New Jersey Digital Driver's License;

WHEREAS IN TRUTH AND IN FACT, as the said JOSE IRIZARRY then and there well knew, he was not "E.E.C.-A." and the New Jersey Digital Driver's License and purchase agreements were not legitimate, and said JOSE IRIZARRY, did not intend to pay for the motor vehicles, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Impersonation - Second Degree)

JOSE IRIZARRY

between on or about September 27, 2018, and on or about November 29, 2018, at the Township of Parsippany-Troy Hills, in the County of Morris, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another in an amount of \$75,000 or more, or to injure or defraud another, did impersonate another or assume a false identity and did acts in such assumed character or false identity, that is, the said JOSE IRIZARRY did impersonate or assume the identity of "E.E.C.-A.," whose identity is known to the grand jurors, and fraudulently purchased motor vehicles in his name, with an aggregate value in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:21-17(a)(1) and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Use of Personal Identifying Information  
of Another - Second Degree)

ANDY MAZARA

on or about November 15, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly exhibit, display, or utter a document or other writing which belongs or pertains to a person other than the person who possesses the document, that is, a Puerto Rico Driver's License, birth certificate, social security card, and/or an ATM card in the name of "J.B.S.-R.," whose identity is known by the Grand Jury, in obtaining a document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, that is, a New Jersey Digital Driver's License, contrary to the provisions of N.J.S.A. 2C:21-17.2, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Tampering with Public Records or Information - Third Degree)

ANDY MAZARA

on or about November 15, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an application for a New Jersey Digital Driver's License, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Theft by Deception - Second Degree)

ANDY MAZARA

between on or about November 27, 2018, and on or about December 21, 2018, at the Township of Hamilton, in the County of Mercer, at the Township of Hillside, in the County of Union, at the Township of Green Brook, in the County of Somerset, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of another, having an aggregate value in excess of \$75,000, by deception, that is, the said ANDY MAZARA purposely did steal motor vehicles and/or watercraft by impersonating "J.B.S.-R.," whose identity is known to the grand jurors, and submitting fraudulent purchase agreements and a fictitious New Jersey Digital Driver's License to car and/or boat dealerships, thereby creating or reinforcing a false impression to the dealerships as to his identity, and the validity of the purchase agreements and the New Jersey Digital Driver's License;

WHEREAS IN TRUTH AND IN FACT, as the said ANDY MAZARA then and there well knew, he was not "J.B.S.-R." and the New Jersey Digital Driver's License and purchase agreements were not legitimate, and said ANDY MAZARA, did not intend to pay for the motor vehicles and/or watercraft, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of

the same.

COUNT FOURTEEN

(Impersonation - Second Degree)

ANDY MAZARA

between on or about November 27, 2018, and on or about December 21, 2018, at the Township of Hamilton, in the County of Mercer, at the Township of Hillside, in the County of Union, at the Township of Green Brook, in the County of Somerset, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another in an amount of \$75,000 or more, or to injure or defraud another, did impersonate another or assume a false identity and did acts in such assumed character or false identity, that is, the said ANDY MAZARA did impersonate or assume the identity of "J.B.S.-R.," whose identity is known to the grand jurors, and fraudulently purchased motor vehicles and/or watercraft in his name, with an aggregate value in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:21-17(a)(1) and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Use of Personal Identifying Information  
of Another - Second Degree)

RICARDO ACEVEDO

on or about May 22, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly exhibit, display, or utter a document or other writing which belongs or pertains to a person other than the person who possesses the document, that is, a Puerto Rico Driver's License, birth certificate, social security card, and an ATM card in the name of "A.T.-V.," whose identity is known by the Grand Jury, in obtaining a document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, that is, a New Jersey Digital Driver's License, contrary to the provisions of N.J.S.A. 2C:21-17.2, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Tampering with Public Records or Information - Third Degree)

RICARDO ACEVEDO

on or about May 22, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an application for a New Jersey Digital Driver's License, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Theft by Deception - Second Degree)

RICARDO ACEVEDO

between on or about May 24, 2018, and on or about June 14, 2018, at the City of Paramus, at the City of Englewood, all in the County of Bergen, at the Township of Hillside, in the County of Union, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of another, having an aggregate value in excess of \$75,000, by deception, that is, the said RICARDO ACEVEDO purposely did steal motor vehicles and/or watercraft by impersonating "A.T.-V.," whose identity is known to the grand jurors, and submitting fraudulent purchase agreements and a fictitious New Jersey Digital Driver's License to car and/or motorcycle dealerships, thereby creating or reinforcing a false impression to the dealerships as to his identity, and the validity of the purchase agreement and the New Jersey Digital Driver's License;

WHEREAS IN TRUTH AND IN FACT, as the said RICARDO ACEVEDO then and there well knew, he was not "A.T.-V." and the New Jersey Digital Driver's License and purchase agreements were not legitimate, and said RICARDO ACEVEDO, did not intend to pay for the motor vehicles and/or watercraft, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity

of the same.

COUNT EIGHTEEN

(Impersonation - Second Degree)

RICARDO ACEVEDO

between on or about May 24, 2018, and on or about June 14, 2018, at the City of Paramus, at the City of Englewood, all in the County of Bergen, at the Township of Hillside, in the County of Union, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another in an amount of \$75,000 or more, or to injure or defraud another, did impersonate another or assume a false identity and did acts in such assumed character or false identity, that is, the said RICARDO ACEVEDO did impersonate or assume the identity of "A.T.-V.," whose identity is known to the grand jurors, and fraudulently purchased motor vehicles and/or watercraft in his name, with an aggregate value in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:21-17(a)(1) and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Use of Personal Identifying Information  
of Another - Second Degree)

TIRSON RUIZ

on or about July 6, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly exhibit, display, or utter a document or other writing which belongs or pertains to a person other than the person who possesses the document, that is, a Puerto Rico Driver's License, birth certificate, social security card, and/or a bill in the name of "A.R.S.-C.," whose identity is known by the Grand Jury, in obtaining a document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, that is a New Jersey Digital Driver's License, contrary to the provisions of N.J.S.A. 2C:21-17.2, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Tampering with Public Records or Information - Third Degree)

TIRSON RUIZ

on or about July 6, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an application for a New Jersey Digital Driver's License, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Theft by Deception - Third Degree)

TIRSON RUIZ

on or about July 19, 2018, at the Town of Princeton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of another, having a value in excess of \$500, by deception, that is, the said TIRSON RUIZ purposely did steal a motor vehicle by impersonating "A.R.S.-C.," whose identity is known to the grand jurors, and submitting a fraudulent purchase agreement and a fictitious New Jersey Digital Driver's License to a car dealership, thereby creating or reinforcing a false impression to the dealership as to his identity, and the validity of the purchase agreement and the New Jersey Digital Driver's License;

WHEREAS IN TRUTH AND IN FACT, as the said TIRSON RUIZ then and there well knew, he was not "A.R.S.-C." and the New Jersey Digital Driver's License and purchase agreement were not legitimate, and said TIRSON RUIZ, did not intend to pay for the motor vehicle, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), 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

(Impersonation - Third Degree)

TIRSON RUIZ

on or about July 19, 2018, at the Town of Princeton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another in an amount of \$500 or more, or to injure or defraud another, did impersonate another or assume a false identity and did acts in such assumed character or false identity, that is, the said TIRSON RUIZ did impersonate or assume the identity of "A.R.S.-C.," whose identity is known to the grand jurors, and fraudulently purchased a motor vehicle in his name, with a value in excess of \$500, contrary to the provisions of N.J.S.A. 2C:21-17(a)(1) and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Use of Personal Identifying Information  
of Another - Second Degree)

ALVARO J. ALVAREZ-CAPIO

on or about June 20, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly exhibit, display, or utter a document or other writing which belongs or pertains to a person other than the person who possesses the document, that is, a Puerto Rico Driver's License, birth certificate, social security card, and/or a bill in the name of "R.E.S.-T.," whose identity is known by the Grand Jury, in obtaining a document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, that is a New Jersey Digital Driver's License, contrary to the provisions of N.J.S.A. 2C:21-17.2, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Tampering with Public Records or Information - Third Degree)

ALVARO J. ALVAREZ-CAPIO

on or about June 20, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an application for a New Jersey Digital Driver's License, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Theft by Deception - Third Degree)

ALVARO J. ALVAREZ-CAPIO

on or about June 28, 2018, at the City of Paramus, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of another, having a value in excess of \$500, by deception, that is, the said ALVARO J. ALVAREZ-CAPIO purposely did steal a motor vehicle by impersonating "R.E.S.-T.," whose identity is known to the grand jurors, and submitting a fraudulent purchase agreement and a fictitious New Jersey Digital Driver's License to a car dealership, thereby creating or reinforcing a false impression to the dealership as to his identity, and the validity of the purchase agreement and the New Jersey Digital Driver's License;

WHEREAS IN TRUTH AND IN FACT, as the said ALVARO J. ALVAREZ-CAPIO then and there well knew, he was not "R.E.S.-T." and the New Jersey Digital Driver's License and purchase agreement were not legitimate, and said ALVARO J. ALVAREZ-CAPIO, did not intend to pay for the motor vehicle, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), 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

(Impersonation - Third Degree)

ALVARO J. ALVAREZ-CAPIO

on or about June 28, 2018, at the City of Paramus, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another in an amount of \$500 or more, or to injure or defraud another, did impersonate another or assume a false identity and did acts in such assumed character or false identity, that is, the said RICARDO ACEVEDO did impersonate or assume the identity of "R.E.S.-T.," whose identity is known to the grand jurors, and fraudulently purchased a motor vehicle in his name, with a value in excess of \$500, contrary to the provisions of N.J.S.A. 2C:21-17(a)(1) and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Use of Personal Identifying Information  
of Another - Second Degree)

WILLIE ANTONIO SAMUEL-BALDAYAQUEZ

on or about May 18, 2018, at the City of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did knowingly exhibit, display, or utter a document or other writing which belongs or pertains to a person other than the person who possesses the document, that is, a Puerto Rico Driver's License, birth certificate, and/or a social security card, all in the name of "J.L.C.-F.," whose identity is known by the Grand Jury, in obtaining a document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, that is a New Jersey Digital Driver's License, contrary to the provisions of N.J.S.A. 2C:21-17.2, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Tampering with Public Records or Information - Third Degree)

WILLIE ANTONIO SAMUEL-BALDAYAQUEZ

on or about May 18, 2018, at the City of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an application for a New Jersey Digital Driver's License, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-NINE

(Tampering with Public Records or Information - Third Degree)

TAINA PEREZ

on or about September 13, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Tampering with Public Records or Information - Third Degree)

TAINA PEREZ

on or about September 27, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

ANDY MAZARA

on or about January 12, 2019, at the Township of Washington, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

TAINA PEREZ

on or about October 4, 2018, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

TAINA PEREZ

on or about September 27, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

TAINA PEREZ

on or about October 1, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

ANDY MAZARA

on or about March 20, 2019, Township of Washington, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

TAINA PEREZ

on or about October 12, 2018, at the Borough of Wallington, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

TAINA PEREZ

AND

REYFY GONZALEZ

on or about December 31, 2018, at the City of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, Application for Vehicle Registration and/or Title paperwork, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

JOSE IRIZARRY

on or about October 19, 2018, at the Township of Washington, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

JOSE IRIZARRY

on or about October 16, 2018, at the Township of Parsippany-Troy Hills, in the County of Morris, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT FORTY

(Tampering with Public Records or Information - Third Degree)

JOSE IRIZARRY

on or about December 7, 2018, at the Borough of Wallington, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

RICARDO ACEVEDO

on or about May 24, 2018, at the City of Paramus, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

RICARDO ACEVEDO

on or about May 25, 2018, at the City of Englewood, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

TAINA PEREZ

on or about May 29, 2018, at the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

RICARDO ACEVEDO

on or about May 30, 2018, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

RICARDO ACEVEDO

AND

REYFY GONZALEZ

on or about December 31, 2018, at the City of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

RICARDO ACEVEDO

on or about June 14, 2018, at the Township of Belleville, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

ANDY MAZARA

on or about November 27, 2018, at the Township of Hamilton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

ANDY MAZARA

on or about November 29, 2018, at the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

ANDY MAZARA

on or about December 19, 2018, at the Borough of Oakland, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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

(Tampering with Public Records or Information - Third Degree)

ANDY MAZARA

on or about January 8, 2019, at the Borough of Somerville, in the County of Somerset, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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-ONE

(Tampering with Public Records or Information - Third Degree)

TIRSON RUIZ

on or about July 23, 2018, at the Town of Princeton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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-TWO

(Tampering with Public Records or Information - Third Degree)

TIRSON RUIZ

AND

WILLIE ANTONIO SAMUEL-BALDAYAQUEZ

on or about October 9, 2018, at the Township of Washington, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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-THREE

(Tampering with Public Records or Information - Third Degree)

ALVARO J. ALVAREZ-CAPIO

on or about July 25, 2018, at the City of Paramus, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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-FOUR

(Tampering with Public Records or Information - Third Degree)

ALVARO J. ALVAREZ-CAPIO

AND

TAINA PEREZ

on or about September 13, 2018, at the City of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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-FIVE

(Tampering with Public Records or Information - Third Degree)

ALVARO J. ALVAREZ-CAPIO

on or about July 23, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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-SIX

(Tampering with Public Records or Information - Third Degree)

ALVARO J. ALVAREZ-CAPIO

AND

WILLIE ANTONIO SAMUEL-BALDAYAQUEZ

on or about September 13, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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-SEVEN

(Tampering with Public Records or Information - Third Degree)

ALVARO J. ALVAREZ-CAPIO

on or about July 27, 2018, at the Township of East Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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-EIGHT

(Tampering with Public Records or Information - Third Degree)

ALVARO J. ALVAREZ-CAPIO

AND

WILLIE ANTONIO SAMUEL-BALDAYAQUEZ

on or about October 9, 2018, at the Borough of Somerville, in the County of Somerset, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(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

(Tampering with Public Records or Information - Third Degree)

ALVARO J. ALVAREZ-CAPIO

on or about July 20, 2018, at the Township of East Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT SIXTY

(Tampering with Public Records or Information - Third Degree)

JOSE IRIZARRY

on or about October 9, 2018, at the Township of Washington, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

WILLIE ANTONIO SAMUEL-BALDAYAQUEZ

on or about September 4, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Tampering with Public Records or Information - Third Degree)

WILLIE ANTONIO SAMUEL-BALDAYAQUEZ

on or about August 15, 2018, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-THREE

(Tampering with Public Records or Information - Third Degree)

GUILLERMO ALEX CRUZ-GUERRERO

on or about February 27, 2017, at the City of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-FOUR

(Tampering with Public Records or Information - Third Degree)

GUILLERMO ALEX CRUZ-GUERRERO

on or about March 8, 2017, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing an Application for Certificate of Ownership, knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2), 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

(Fencing-Dealing in Stolen Property - Second Degree)

GUILLERMO ALEX CRUZ-GUERRERO

between on or about September 14, 2018, and on or about October 24, 2018, at the City of Jersey City, in the County of Hudson, 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.

  
\_\_\_\_\_  
AAG Lyndsay V. Ruotolo  
Director  
Division of Criminal Justice

A TRUE BILL:

\_\_\_\_\_  
Alternate Foreperson

Date: 11/5/2021