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1:20 P.M.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. William H. Walls
	:	
v.	:	Crim. No. 16-495
	:	
WILMER CHAVEZ ROMERO,	:	18 U.S.C. §§ 924(c)(1)(A)(iii), 924(j)(1),
a/k/a "Charmin"	:	1959(a)(1), 1959(a)(3), 1962(c),
	:	1962(d), and 2, and 8 U.S.C. § 1324

SUPERSEDING INDICTMENT

COUNT ONE
(Racketeering)

The Grand Jury in and for the District of New Jersey, sitting in Newark,
charges:

The Enterprise

1. At various times relevant to this Superseding Indictment, in the District of New Jersey, and elsewhere, defendant WILMER CHAVEZ ROMERO, a/k/a "Charmin" ("CHAVEZ"), and others, known and unknown, were members of a criminal organization (the "Hernandez Enterprise"), that operated principally in the New Jersey Counties of Cumberland, Essex, Mercer, Middlesex, Monmouth, and Ocean.

2. The Hernandez Enterprise primarily functioned as a business that provided prostitution services to customers in exchange for money. The Hernandez Enterprise operated multiple brothels at various locations in New Jersey. In connection with operating those brothels, the Hernandez Enterprise employed prostitutes, brothel managers, and persons who committed violent

acts designed to promote, protect, and otherwise assist the prostitution business ("Enforcers").

3. The Hernandez Enterprise, including its leadership, membership, and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The Hernandez Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Hernandez Enterprise.

4. At all times relevant to this Superseding Indictment, CHAVEZ was a member of the Hernandez Enterprise and was responsible for furthering the affairs of the enterprise.

Purposes of the Enterprise

5. The purposes of the Hernandez Enterprise included the following:

a. Promoting and enhancing the Hernandez Enterprise and the activities of its members and associates, which activities included, but were not limited to, prostitution, including prostitution involving interstate transport, harboring illegal aliens, assault, robbery, and murder;

b. Expanding, preserving, and protecting the power, territory, reputation, and profits of the Hernandez Enterprise and of its members and associates, through the use of intimidation, violence, threats of violence, assaults, and murder;

c. Hindering, obstructing, and preventing law enforcement from identifying participants in the Hernandez Enterprise's criminal activities, from apprehending the offenders of those crimes, and from successfully prosecuting those offenders;

d. Threatening and assaulting individuals who were disloyal to the Hernandez Enterprise; and

e. Financially enriching the leaders, members and associates of the Hernandez Enterprise with the proceeds of the prostitution activity.

6. The Hernandez Enterprise was led by, among others, Co-Conspirator-1 and Co-Conspirator-2. CHAVEZ and other members and associates acted under their direction as, among other things, prostitutes, managers, and Enforcers. Among the method and means by which CHAVEZ and other members and associates conducted and participated in the affairs of the Hernandez Enterprise were the following:

a. Co-Conspirator-1, Co-Conspirator-2, and other members and associates of the Hernandez Enterprise established and oversaw the operation of brothels at various locations throughout the state of New Jersey, including New Brunswick, Trenton, Orange, Asbury Park, Lakewood, and Bridgeton. Each brothel employed prostitutes and was managed by a "house manager" whose responsibilities included overseeing the prostitutes, collecting the customers' money, and ultimately remitting the money to Co-Conspirator-1 and Co-Conspirator-2.

b. CHAVEZ and other members and associates of the Hernandez Enterprise threatened, committed, attempted to commit, and assisted in the commission of murder, assault, and robbery for the purpose of, among other things, thwarting operations of rival brothels and seeking revenge against persons they believed had perpetrated or intended to perpetrate violence against members and associates of the Hernandez Enterprise.

c. The Hernandez Enterprise also knowingly employed illegal aliens to, among other things, work as prostitutes, house managers, and Enforcers. Hernandez Enterprise members also concealed, harbored, and otherwise shielded illegal aliens from law enforcement detection.

The Racketeering Violation

7. From at least as early as March 6, 2011 through on or about September 18, 2014, in Cumberland, Essex, Mercer, Middlesex, Monmouth, and Ocean Counties, in the District of New Jersey, and elsewhere, defendant

WILMER CHAVEZ ROMERO,
a/k/a “Charmin,”

together with others known and unknown, being a person employed by and associated with the Hernandez Enterprise, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conducted and participated, directly and indirectly, in the conduct of the Hernandez Enterprise’s affairs through a pattern of racketeering activity, that is, through the commission of the following acts: Racketeering Acts One through Four, as set forth below in paragraphs Nine through Twelve.

8. The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following acts committed in the District of New Jersey, and elsewhere:

Racketeering Act One

9. The defendant committed the following acts, either one of which alone constitutes the commission of Racketeering Act One:

a. On or about September 4, 2012, in Mercer County, in the District of New Jersey, and elsewhere, defendant WILMER CHAVEZ ROMERO, a/k/a "Charmin," did knowingly and purposely rob victim N.R.G. and victim F.V., in violation of N.J.S.A. 2C:15-1(a) and 2C:2-6.

b. On or about September 4, 2012, in Mercer County, in the District of New Jersey, and elsewhere, defendant WILMER CHAVEZ ROMERO, a/k/a "Charmin," in concert with other persons, did knowingly and purposely murder and cause the death of victim N.R.G., during and in the course of the commission of a robbery, in violation of N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:11-3(a)(3) and 2C:2-6.

Racketeering Act Two

10. On or about January 23, 2013, in Mercer County, in the District of New Jersey and elsewhere, defendant WILMER CHAVEZ ROMERO, a/k/a "Charmin," in concert with other persons, did knowingly and purposely murder and cause the death of victim B.E., during and in the course of the commission of a robbery, in violation of N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:11-3(a)(3) and 2C:2-6.

Racketeering Act Three

11. From on or about March 6, 2011, through on or about September 18, 2014, in Cumberland, Essex, Mercer, Middlesex, Monmouth, and Ocean Counties, in the District of New Jersey and elsewhere, defendant WILMER CHAVEZ ROMERO, a/k/a "Charmin," knowing and in reckless disregard of the fact that certain aliens had come to, entered, and remained in the United States in violation of law, did conspire and agree with Co-Conspirator-1 and others to conceal, harbor, and shield from detection such aliens for the purpose of commercial advantage and private financial gain, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(iii), in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and (a)(1)(B)(i).

Racketeering Act Four

12. From on or about March 6, 2011, through on or about September 18, 2014, in Cumberland, Essex, Mercer, Middlesex, Monmouth, and Ocean Counties, in the District of New Jersey and elsewhere, defendant WILMER CHAVEZ ROMERO, a/k/a "Charmin," did knowingly aid and abet Co-Conspirator-1 and others to transport and cause the transportation of individuals, in interstate commerce, with the intent that such individuals engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2421(a) and Section 2.

All in violation of Title 18, United States Code, Section 1962(c).

COUNT TWO
(Racketeering Conspiracy)

1. The allegations contained in paragraphs One through Six of Count One of this Superseding Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

2. From at least as early as March 6, 2011 through on or about September 18, 2014, in Cumberland, Essex, Mercer, Middlesex, Monmouth, and Ocean Counties, in the District of New Jersey, and elsewhere, defendant

WILMER CHAVEZ ROMERO,
a/k/a "Charmin,"

together with others known and unknown, each being a person employed by and associated with the Hernandez Enterprise, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired and agreed with others to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the Hernandez Enterprise's affairs through a pattern of racketeering activity as that term is defined by Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of the acts set forth in paragraphs Nine through Twelve of Count One of this Superseding Indictment, as Racketeering Acts One through Four, which are realleged and incorporated as if fully set forth herein.

3. It was a part of the conspiracy that the defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Hernandez Enterprise.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT THREE
(Assault with a Dangerous Weapon in Aid of Racketeering)

1. The allegations contained in paragraphs One through Six of Count One of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. At all times relevant to this Superseding Indictment, the Hernandez Enterprise, including its leadership, membership and associates, constituted an enterprise, as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The Hernandez Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Hernandez Enterprise.

3. At all times relevant to this Superseding Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is:

a. Multiple acts involving murder and robbery chargeable under New Jersey law;

b. Multiple acts which are indictable under Title 8, United States Code, Section 1324; and

c. Multiple acts which are indictable under Title 18, United States Code, Section 2421.

4. On or about September 4, 2012, in Mercer County, in the District of New Jersey, and elsewhere, defendant

WILMER CHAVEZ ROMERO,
a/k/a "Charmin,"

as consideration for the receipt of, and as consideration for a promise and agreement to pay a thing of pecuniary value from the Hernandez Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Hernandez Enterprise, an enterprise engaged in racketeering activity, did knowingly and purposefully assault victim F.V. with a dangerous weapon, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

In violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT FOUR
(Murder in Aid of Racketeering)

1. The allegations contained in paragraphs One through Three of Count Three of this Superseding Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about September 4, 2012, in Mercer County, in the District of New Jersey, and elsewhere, defendant

WILMER CHAVEZ ROMERO,
a/k/a "Charmin,"

as consideration for the receipt of, and as consideration for a promise and agreement to pay a thing of pecuniary value from the Hernandez Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Hernandez Enterprise, an enterprise engaged in racketeering activity, did knowingly and purposefully murder victim N.R.G., contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:11-3(a)(3) and 2C:2-6.

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT FIVE
(Murder in Aid of Racketeering)

1. The allegations contained in paragraphs One through Three of Count Three of this Superseding Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about January 23, 2013, in Mercer County, in the District of New Jersey and elsewhere, defendant

WILMER CHAVEZ ROMERO,
a/k/a "Charmin,"

as consideration for the receipt of, and as consideration for a promise and agreement to pay a thing of pecuniary value from the Hernandez Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Hernandez Enterprise, an enterprise engaged in racketeering activity, did knowingly and purposefully murder victim B.E., contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:11-3(a)(3) and 2C:2-6.

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT SIX
(Use and Carrying of a Firearm During a Crime of Violence)

On or about September 4, 2012, in Mercer County, in the District of New Jersey and elsewhere, defendant

WILMER CHAVEZ ROMERO,
a/k/a "Charmin,"

during and in relation to a crime of violence for which the defendant could be prosecuted in a court of the United States, specifically, the murder in aid of racketeering alleged in Count Four of this Superseding Indictment, did knowingly use and carry, and, in furtherance of such crime, did possess a firearm, which was discharged, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and Section 2.

COUNT SEVEN
(Use and Carrying of a Firearm During a Crime of Violence)

On or about January 23, 2013, in Mercer County, in the District of New Jersey and elsewhere, defendant

WILMER CHAVEZ ROMERO,
a/k/a "Charmin,"

during and in relation to a crime of violence, for which the defendant could be prosecuted in a Court of the United States, namely, the murder in aid of racketeering alleged in Count Five of this Superseding Indictment, did knowingly use and carry, and, in furtherance of such crime, did possess a firearm, which was discharged, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and Section 2.

COUNT EIGHT
(Conspiracy to Commit Alien Harboring)

1. The allegations contained in paragraphs One through Six and Nine through Twelve of Count One of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

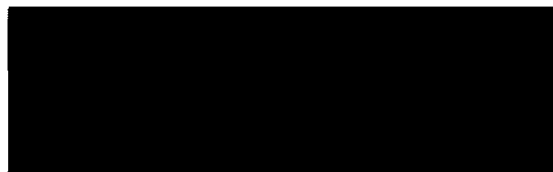
2. From on or about March 6, 2011, through on or about September 18, 2014, in Cumberland, Essex, Mercer, Middlesex, Monmouth, and Ocean Counties, in the District of New Jersey and elsewhere, defendant

WILMER CHAVEZ ROMERO,
a/k/a "Charmin,"

knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, did conspire and agree with Co-Conspirator-1 and others to conceal, harbor, and shield from detection such aliens for the purpose of commercial advantage and private financial gain, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(iii).

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and (a)(1)(B)(i).

A TRUE BILL




CRAIG CARPENITO
United States Attorney

CASE NUMBER: 16-495

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**WILMER CHAVEZ ROMERO,
a/k/a "Charmin"**

SUPERSEDING INDICTMENT FOR

18 U.S.C. §§ 924(c)(1)(A)(iii), 924(j)(1),
1959(a)(1), 1959(a)(3), 1962(c), 1962(d), & 2, and
8 U.S.C. § 1324

A True Bill,



CRAIG CARPENITO

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