

COMPLAINT - WARRANT

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. PAUL J CANEIRO ADDRESS: 27 TILTON DRIVE OCEAN NJ 07712-0000	
1304	W	2018	000058		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
COLTS NECK TWP MUNICIPAL COURT 124 CEDAR DRIVE COLTS NECK NJ 07722-0000 732-431-1799 COUNTY OF: MONMOUTH					
# of CHARGES 7	CO-DEFTS	POLICE CASE #: 18CN10182		DEFENDANT INFORMATION	
COMPLAINANT NAME: DET. R ZARILLO 124 CEDAR DRIVE ATTN WARRANTS COLTS NECK NJ 07722				SEX: M EYE COLOR: BLUE DOB: 12/30/1966 DRIVER'S LIC. #. DL STATE: SOCIAL SECURITY #: XXX-XX-X SBI #: TELEPHONE #: (C) LIVSCAN PCN #:	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **11/20/2018** in **COLTS NECK TWP**, **MONMOUTH County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, DID PURPOSELY OR KNOWINGLY CAUSE THE DEATH OF KEITH CANEIRO, OR SERIOUS BODILY INJURY RESULTING IN THE DEATH OF KEITH CANEIRO, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:11-3A(1) OR (2), A CRIME OF THE FIRST DEGREE

WITHIN THE JURISDICTION OF THIS COURT, DID PURPOSELY OR KNOWINGLY CAUSE THE DEATH OF JENNIFER CANEIRO, OR SERIOUS BODILY INJURY RESULTING IN THE DEATH OF JENNIFER CANEIRO, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:11-3A(1) OR (2), A CRIME OF THE FIRST DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID PURPOSELY OR KNOWINGLY CAUSE THE DEATH OF J.C., OR SERIOUS BODILY INJURY RESULTING IN THE DEATH OF J.C., CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:11-3A(1) OR (2), A CRIME OF THE FIRST DEGREE.

in violation of:

Original Charge	1) 2C:11-3A(1)	2) 2C:11-3A(1)	3) 2C:11-3A(1)
Amended Charge			

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DET. R ZARILLO

Date: 11/29/2018

You will be notified of your Central First Appearance/CJP date to be held at the Superior Court in the county of **MONMOUTH** at the following address: **MONMOUTH COUNTY COURTS**

71 MONUMENT PARK

PO BOX 1271

FREEHOLD

NJ 07728-0000

Date of Arrest:

Appearance Date:

Time:

Phone: **732-677-4500**

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause IS found for the issuance of this complaint. **KATHRYNE BRADACH JUDICIAL OFFICER** 11/29/2018
Signature and Title of Judicial Officer Issuing Warrant Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: _____ by: _____

(if different from judicial officer that issued warrant)

☐ Domestic Violence – Confidential

☒ Related Traffic Tickets or Other Complaints

☒ Serious Personal Injury/ Death Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
- ☐ No possession firearms/weapons
- ☐ Other (specify):

ORIGINAL

COMPLAINT - WARRANT

COMPLAINT NUMBER

1304**W****2018****000058**

STATE V.

PAUL J CANEIRO

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

WITHIN THE JURISDICTION OF THIS COURT, DID PURPOSELY OR KNOWINGLY CAUSE THE DEATH OF S.C., OR SERIOUS BODILY INJURY RESULTING IN THE DEATH OF S.C., CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:11-3A(1) OR (2), A CRIME OF THE FIRST DEGREE

WITHIN THE JURISDICTION OF THIS COURT, DID START A FIRE ON THE PROPERTY OF ANOTHER, TO WIT, 15 WILLOW BROOK ROAD, COLTS NECK NJ, OWNED BY KEITH CANEIRO AND/OR JENNIFER CANEIRO, THEREBY PURPOSELY OR KNOWINGLY PLACING ANOTHER PERSON IN DANGER OF DEATH OR SERIOUS BODILY INJURY AND/OR WITH THE PURPOSE OF DESTROYING THE STRUCTURE OF ANOTHER, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:17-1A(1) AND/OR (2), A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID HAVE IN HIS POSSESSION A FIREARM WITH A PURPOSE TO USE IT UNLAWFULLY AGAINST THE PERSON OF ANOTHER, TO WIT, KEITH CANEIRO AND/OR JENNIFER CANEIRO, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:39-4A(1), A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID HAVE IN HIS POSSESSION A WEAPON, TO WIT, A KNIFE, WITH THE PURPOSE TO USE IT UNLAWFULLY AGAINST THE PERSON OF ANOTHER, TO WIT, JENNIFER CANEIRO AND/OR J.C. AND/OR S.C., CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:39-4D, A CRIME OF THE THIRD DEGREE.

Original Charge	4) 2C:11-3A(1)	5) 2C:17-1A(1)	6) 2C:39-4.1A
Amended Charge			

COMPLAINT - WARRANT

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NJ/CDR2 1/1/2017

COMPLAINT - WARRANT

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STATE V.

PAUL J CANEIRO

Original Charge

7) 2C:39-4D

Amended Charge

COMPLAINT - WARRANT

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NJ/CDR2 1/1/2017

Affidavit of Probable Cause

COMPLAINT NUMBER			
1304	W	2018	000058
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
COLTS NECK TWP MUNICIPAL COURT 124 CEDAR DRIVE COLTS NECK NJ 07722-0000 732-431-1799 COUNTY OF: MONMOUTH			
# of CHARGES 7	CO-DEFTS	POLICE CASE #: 18CN10182	
COMPLAINANT DET. R ZARILLO NAME: 124 CEDAR DRIVE ATTN WARRANTS COLTS NECK NJ 07722		DEFENDANT INFORMATION SEX: M EYE COLOR: BLUE DOB: 12/30/1966 DRIVER'S LIC. #. DL STATE: SOCIAL SECURITY #: xxx-xx-x SBI #: TELEPHONE #: LIVESCAN PCN #:	

THE STATE OF NEW JERSEY

VS.

PAUL J CANEIRO

ADDRESS: 27 TILTON DRIVE

OCEAN

NJ 07712-0000

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:
See Attached

Affidavit of Probable Cause

Affidavit of Probable Cause

COMPLAINT NUMBER

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2018

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COURT CODE

PREFIX

YEAR

SEQUENCE NO.

THE STATE OF NEW JERSEY

VS.

PAUL J CANEIRO

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

See Attached

3. If victim was injured, provide the extent of the injury:

Four Deceased Victims

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DET. R ZARILLO LAW ENFORCEMENT OFFICER

Date: 11/29/2018

Affidavit of Probable Cause

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1/1/2017

This Probable cause affidavit is a continuation of the probable cause affidavit provided on W-2018-00790-1337.

Police identified a total of 4 vehicles at the scene: 1) the above-mentioned white Porsche Macan; 2) a 2014 Porsche 911 Carrera, parked in front of the garage on the driveway; 3) a 2016 Jeep Wrangler, parked on the driveway; 4) a 2016 Porsche Cayenne, initially parked in the garage but moved to the street by Paul Caneiro. It was the same vehicle later driven to the Ocean Township Police Department by Paul Caneiro, who was accompanied by Susan, Katelyn and Marisa.

Additionally, a Fire Marshall and his K9 Titan responded to 27 Tilton Drive so that K9 Titan could conduct a search of the area for the presence of accelerants. K9 Titan indicated the presence of accelerant in the following locations: the "C/D" corner of the house by the outside of the basement window, near the garage on the "B/C" corner of the house, inside the garage underneath the plastic floor tiles, and inside the trunk as well as the front corner of the aforementioned partially burned Porsche Macan vehicle, bearing NJ Registration DCJ31.

A search warrant was obtained from the Honorable James J. McGann to search the aforementioned vehicles as well as 27 Tilton Drive. During the search of the Porsche Cayenne, a backpack was located containing a laptop, the passport of Paul Caneiro, a 9 mm barrel of a Sig Sauer firearm, firearm accessories/parts believed to be used to suppress the sound and/or muzzle flash of gunfire, and a night vision firearm accessory that attaches to a firearm, identified as a "Flir." These items were secured by members of the Monmouth County Prosecutor's Office Crime Scene Unit and transported to the New Jersey State Police Ballistics Lab for analysis.

During the investigation into the fire, a large gun safe was located in the garage of 27 Tilton Drive. A firearms inquiry revealed that Paul Caneiro has multiple firearms registered to him. Located in the basement of 27 Tilton Drive was a vast amount of firearms and a variety of ammunition, including ammunition identified as Fiocchi 9mm, bearing the headstamp "GFL 10 9X19."

Members of the investigative team also obtained surveillance from 19 Oxford Drive in Ocean Township, NJ. This home is located directly behind the Caneiro house and has video cameras on the rear of the residence facing the back of Keith Caneiro's house. According to this video, headlights can be seen exiting the Caneiro house at approximately 2:07 a.m. and arriving back at approximately 4:08 a.m., consistent with the camera located at 30 Tilton Drive;

At approximately 12:38 p.m. on that same date—November 20, 2018—Colts Neck Police were dispatched to a fire at 15 Willow Brook Road, Colts Neck, NJ. During the course of the fire suppression efforts, four individuals were found deceased at the residence. These individuals are Paul Caneiro's brother, Keith Caneiro; sister-in-law, Jennifer Caneiro; eight-year-old niece, Sophia Caneiro; and eleven-year-old nephew, Jesse Caneiro.

Specifically, the Monmouth County Communications Center received a 911 call from a neighbor of 15 Willow Brook Road, who reported a structure fire at the residence. Shortly thereafter, members of the Colts Neck Police Department arrived on scene. Same confirmed that the residence was on fire, and that there was a male subject, later identified as the homeowner, Keith Caneiro (DOB 5/14/68) laying on the front lawn, deceased. During the course of the investigation, multiple shell casings were located near his body. Those shell casings were identified as Fiocchi 9mm, bearing the headstamp "GFL 10 9X19." A preliminary examination performed by the medical examiner revealed that Keith Caneiro sustained one gunshot wound to the lower back and four gunshot wounds to the head.

Upon entry into the residence, firefighters located three additional deceased bodies. The body of Jesse Caneiro (DOB 11/10/07) was located on the floor of the kitchen. A preliminary examination performed by the medical examiner revealed that Jesse was stabbed multiple times. The body of Sophia Caneiro (DOB 9/16/10) was located on the landing of the stairs between the first and second floors of the residence. A preliminary examination performed by the medical examiner revealed that Sophia Caneiro was stabbed multiple times. The body of Jennifer Caneiro (DOB 5/14/73) was located on the stairs leading from the basement to the first floor of the residence. A preliminary examination performed by the medical examiner revealed that Jennifer Caneiro had one gunshot wound to her head and multiple stab wounds to her torso.

During the course of this investigation, detectives learned that at approximately 3:33 a.m. on November 20, 2018, the Monmouth County Communications Center received a call from an individual who resides in a residence located on Rivers Edge Drive in Colts Neck, approximately 3.5 road miles from 15 Willow Brook Road. He said that he heard what sounded like five gunshots fired in area of Laird Road and Phalanx Road. Colts Neck patrol officers responded to the area but were unable to locate the source of the gunshots. Additionally, detectives located and spoke to a resident of Willow Brook Road who reported that she awoke at approximately 1:30 am and could not fall back to sleep. She reported that she also heard four to five loud "cracks" consistent with gunshots followed by one single gunshot. She specifically noted the time as being 3:10 a.m. as displayed on her cable box. She stated that she is familiar with the sound of gun fire as she has encountered hunters near her home.

During the course of this investigation it was learned that Paul Caneiro and his brother, Keith Caneiro, owned two businesses together: Square One Consulting and EcoStar Pest Management. The business office for both companies was located at 705 Cookman Avenue, Asbury Park, NJ.

Members of the investigative team were contacted by E.B., who indicated that her husband, C.C., was also the brother of Paul Caneiro and Keith Caneiro. She told detectives that based on the fact that both brothers' homes were burned, her husband drove their two children to Pennsylvania to her parent's home for safe-keeping. Detectives Petruzzello and Zarrillo drove to meet with C.C., who told detectives that on November 19, 2018, at 6:58 p.m., his brother, Keith, forwarded him an email that he sent

to two business associates indicting that there was money missing from the business and that he, (Keith), would be discontinuing payment to defendant's wife until he could locate the missing money. In addition, C.C. reported that Keith indicated that he wanted to sell one of the businesses and that Keith told him that he was frustrated with Paul and the amount of money Paul spent from their business accounts.

Detectives interviewed the office manager for the businesses owned by Keith and Paul Caneiro. She revealed that Keith Caneiro was the primary owner (90%) of Squareone, Inc., and that Paul was a minor partner, (10%). She further reported that that Keith and Paul owned EcoStar Pest Management equally. She also indicated that because Paul Caneiro was deemed disabled, due to an automobile accident, his salary was paid to his wife. The office manager reported that in the past year, Keith has told her to stop payment to defendant's wife because of arguments with Paul over money.

On November 23, 2018, investigators continued to search the home of Paul Caneiro, (via search warrant obtained from the Honorable Joseph W. Oxley, J.S.C.), at 27 Tilton Drive, Ocean, NJ, utilizing a NJSP Cadaver Detection K9. NJSP Trooper Matthew Cocking and his K9 Creed conducted a K9 search of the 27 Tilton Drive, Ocean Twp. property for the presence of blood. K9 Creed indicated the presence of blood in the basement of the residence near where the fire was located. In this area was a plastic container containing clothing, including jeans and a latex glove, with red stains consistent with blood.

These aforementioned items were secured by detectives from the Monmouth County Prosecutor's Office and transported to the NJSP Forensic Laboratory for processing. During the examination of the clothes by the staff at the NJSP Forensic Laboratory, a 9mm unspent projectile was located in the fold of the clothing located in the basement. The casing was identified as a "GFL 10 9X19." This ammunition was consistent with the ammunition located inside the home of Paul Caneiro, located at 27 Tilton Rd., Ocean Twp., as well as the spent projectile casings located at 15 Willow Brook Road, near the body of Keith Caneiro. Final determination is pending with the New Jersey State Police's Ballistics Unit.

On November 27, 2018, the New Jersey State Police DNA Laboratory issued a report regarding DNA testing that had been performed. Based upon a review of the analysis, Sophia Caneiro's DNA (blood) was recovered on some of the items that were located in the basement of 27 Tilton Drive. Specifically, Sophia's blood was found in three separate areas on the aforementioned pair of jeans, and her blood was also found on a portion of the aforementioned latex glove. Additionally, Sophia's DNA matched a swab taken from a knife recovered at the victim's residence in Colt's Neck.

Based on the foregoing, Paul Caneiro is charged with four counts of murder, one count of aggravated arson, one count of possession of a firearm for an unlawful purpose, and one count of possession of a weapon for an unlawful purpose.

COMPLAINT - WARRANT

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. PAUL J CANEIRO ADDRESS: 27 TILTON AVENUE OCEAN TWP NJ 07712-0000	
1337	W	2018	000790		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH					
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 180T28507		DEFENDANT INFORMATION SEX: M EYE COLOR: B.TITE DOB: 12/30/1966 DRIVER'S LIC. #: DL STATE: SOCIAL SECURITY #: XXX-XX-X SBI #: 154037E TELEPHONE #: LIVSCAN PCN #: 133702000570	
COMPLAINANT CHRISTOPH BRADY NAME: 399 MONMOUTH ROAD ATTN WARRANTS OAKHURST NJ 07755					

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 11/21/2018 in **OCEAN TWP**, **MONMOUTH** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, DID COMMIT THE CRIME OF AGGRAVATED ARSON; SPECIFICALLY BY PURPOSELY OR KNOWINGLY PLACING ANOTHER PERSON IN DANGER OF DEATH OR BODILY INJURY AND/OR WITH THE PURPOSE OF DESTROYING A BUILDING OR STRUCTURE OF ANOTHER. TO WIT THE DEFENDANT DID SET FIRE TO HIS RESIDENCE BY USING GASOLINE AND IGNITING THE GASOLINE CAUSING THE RESIDENCE TO CATCH FIRE WHILE HIS WIFE AND TWO DAUGHTERS WERE INSIDE. IN VIOLATION OF 2C:17-1A(1) AND/OR (2).

in violation of:

Original Charge	1) 2C:17-1A(1)	2)	3)
Amended Charge			

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: CHRISTOPH BRADY Date: 11/21/2018

You will be notified of your **Central First Appearance/CJP** date to be held at the **Superior Court** in the county of **MONMOUTH** at the following address: **MONMOUTH COUNTY COURTS**
71 MONUMENT PARK **PO BOX 1271** **FREEHOLD** **NJ 07728-0000**
Date of Arrest: 11/21/2018 **Appearance Date:** **Time:** **Phone: 732-677-4500**

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause **IS NOT** found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator _____ Date _____ Signature of Judge _____ Date _____

☒ Probable cause **IS** found for the issuance of this complaint. TIMOTHY MCGOUGHAN **JUDICIAL OFFICER** 11/21/2018
Signature and Title of Judicial Officer Issuing Warrant Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: _____ **by:** _____
(if different from judicial officer that issued warrant)

☒ **Domestic Violence – Confidential** ☐ **Related Traffic Tickets or Other Complaints** ☐ **Serious Personal Injury/ Death Involved**

Special conditions of release:

- ☐ **No phone, mail or other personal contact w/victim**
- ☐ **No possession firearms/weapons**
- ☐ **Other (specify):**

ORIGINAL

Affidavit of Probable Cause

COMPLAINT NUMBER			
1337	W	2018	000790
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH			
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 180T28507	
COMPLAINANT NAME: CHRISTOPH BRADY 399 MONMOUTH ROAD ATTN WARRANTS OAKHURST NJ 07755		DEFENDANT INFORMATION SEX: M EYE COLOR: BLUE DOB: 12/30/1966 DRIVER'S LIC. #. C04106197112664 DL STATE: NJ SOCIAL SECURITY #: xxx-xx-x547 SBI #: 154037E TELEPHONE #: 732-500-7902 (C) LIVESCAN PCN #: 133702008370	

THE STATE OF NEW JERSEY

VS.

PAUL J CANEIRO

ADDRESS: 27 TILTON AVENUE

OCEAN TWP

NJ 07712-0000

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:
see attached document.

Affidavit of Probable Cause

Affidavit of Probable Cause

COMPLAINT NUMBER

1337

W

2018

000790

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

THE STATE OF NEW JERSEY

VS.

PAUL J CANEIRO

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

witness statements, video surveillance recordings, officer investigation/observations

3. If victim was injured, provide the extent of the injury:

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: CHRISTOPH BRADY LAW ENFORCEMENT OFFICER

Date: 11/21/2018

Affidavit of Probable Cause

State of New Jersey vs. Paul Caneiro

On Tuesday, November 20, 2018, at approximately 5:01 AM, the Ocean Township Police Department responded to 27 Tilton Drive, Ocean, NJ to a report of smoke inside the residence. Upon arrival, the responding emergency personnel observed fire activity located to the rear of the residence. A small fire was also observed on the lower portion of a garage door attached to the residence.

The residence was determined to be occupied by the homeowners, Paul Caneiro and his wife, Susan Caneiro as well as their two (2) adult daughters, Marissa Caneiro and Katelyn Caneiro. Upon arrival of the Ocean Township Police Department, the occupants of the home were located in a vehicle, parked in front of the residence. The houses adjacent to the incident location were evacuated for safety purposes. Fire suppression operations were conducted by the Oakhurst Fire Company and Wannamassa Fire Company with the assistance of the Neptune Township Fire Department. The Oakhurst EMS also responded to assist. There were no injuries reported to any of the responding emergency services personnel.

A red colored gasoline gas can was located on the driveway, in close proximity to a white colored Porsche Macan, bearing NJ registration DCJ3105. The aforementioned vehicle had brown staining on the hood, indicative of likely spot pour burn patterns. A charred rubber glove was located on the ground in front of the aforementioned Porsche and garage door that was burned.

Paul Caneiro was determined to be the operator of the white colored Porsche Macan bearing NJ registration DCJ3105, which was parked in the driveway. The vehicle was determined to be a loaner car from the Monmouth Porsche car dealership as Paul's vehicle was being serviced.

A storage shed was located in the back yard of the property. The shed was determined to have a rear door, which was unlocked. Located inside the shed were three (3) gasoline cans. The first two gasoline cans were in line with a space separating them from the third gasoline can indicating that a fourth can had been there and was removed. The gasoline can located on the driveway is believed to be the can that was removed from the shed. Rubber gloves were also located inside and outside the shed.

The residence was determined to have numerous exterior video surveillance cameras affixed to the home. Paul Caneiro later provided written consent to search his DVR system so that members of the investigative team could review the recordings. Paul advised that he could not recall if he had turned off the video recording system on the previous day as he believed suspected that the system was causing his Wi-Fi system to run slow.

A review of the DVR system was conducted which revealed that the last activity recorded on the DVR was on 11/20/18 at 1:29 AM. A review of camera # 03 revealed Paul Caneiro walking into the garage, turning on the light and then walking towards the DVR system which is stored in the

garage. The DVR stops recording at 1:30 AM. Although the recordings could be viewed via a mobile application, the video cameras were determined to be hard wired and not internet (Wi-Fi) based.

Two (2) butane lighters were located inside the home. One (1) lighter was located on a small table within the living room, just inside the front door. A second lighter was located on the living room floor.

Personnel with the Monmouth County Fire Marshal's Office responded to the scene to assist with the investigation and determined that there were two areas where the fire originated. The first area of origin was on the "C/D" corner of the structure and the second area of origin was on the "B/C" corner of the structure, at floor level. The fire was determined to be incendiary in nature. A portable gas detector utilized by the Monmouth County Fire Marshal's Office yielded positive findings of unknown combustible gases. Samples and controls were obtained from both locations.

Members of the investigative team interviewed Paul Caneiro's wife, Susan Caneiro in reference to this investigation. Susan reported that she has been married to Paul since 1992. Susan advised that she and Paul sleep in separate bedrooms within the home based upon marriage difficulties. Susan explained that she was alerted to the fire as the house alarm was sounding within the home. Susan advised that after vacating the home, Paul removed their Porsche Cayenne from the garage and drove it to the street where the family remained until the police and fire department arrived. Susan advised that she believed that the video surveillance cameras at the home were operational at the time of the fire. Susan reported that Paul maintains the cameras. Susan advised that she was not aware of Paul ever turning off the surveillance camera system at the home. Susan also advised that there was a Ring doorbell mounted to the front of the home. A review of those recordings was conducted via consent, which revealed that the last camera activation was on November 15, 2018 at 8:01 PM. Susan advised that she did not know any individual(s) who would want to cause harm to her family and/or their home.

Members of the investigative team traveled to 30 Tilton Drive and reviewed video surveillance recordings maintained at the home. A review of those recordings revealed that on November 20, 2018, at 2:07 AM, a white colored SUV believed to be a Porsche is observed driving past the residence heading towards Green Grove Road. A further review of those recordings revealed the same vehicle returning to Tilton Drive and driving towards the Caneiro's residence at 4:08 a.m.

No vehicles are seen leaving the area at or around the time of the fire.

It should also be noted that, at approximately 12:33 p.m. on November 20, 2018, Colts Neck Police were dispatched to a fire at 15 Willow Brook Road, Colts Neck. During the course of fire suppression efforts, four individuals were found deceased at the residence. These individuals were the defendant's brother, sister-in-law as well as his niece and nephew, ages 8 and 10. The deaths are currently pending autopsies, but significant trauma was noted.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

THE STATE OF NEW JERSEY

:

Plaintiff,

:

v.

:

Indictment No. 19-02-00283
Case No. 18-04915

PAUL CANEIRO,

:

Defendant.

:

FIRST COUNT

MURDER

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Murder, by purposely or knowingly causing the death of K.C., or by purposely or knowingly causing serious bodily injury resulting in the death of K.C., contrary to the provisions of N.J.S.A. 2C:11-3a(1) and/or N.J.S.A. 2C:11-3a(2), and against the peace of this State, the Government, and dignity of the same.

SECOND COUNT

MURDER

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this

Court, did commit the crime of Murder, by purposely or knowingly causing the death of J.C., or by purposely or knowingly causing serious bodily injury resulting in the death of J.C., contrary to the provisions of N.J.S.A. 2C:11-3a(1) and/or N.J.S.A. 2C:11-3a(2), and against the peace of this State, the Government, and dignity of the same.

THIRD COUNT

MURDER

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Murder, by purposely or knowingly causing the death of J.C., or by purposely or knowingly causing serious bodily injury resulting in the death of J.C., contrary to the provisions of N.J.S.A. 2C:11-3a(1) and/or N.J.S.A. 2C:11-3a(2), and against the peace of this State, the Government, and dignity of the same.

FOURTH COUNT

MURDER

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Murder, by purposely or knowingly

causing the death of S.C., or by purposely or knowingly causing serious bodily injury resulting in the death of S.C., contrary to the provisions of N.J.S.A. 2C:11-3a(1) and/or N.J.S.A. 2C:11-3a(2), and against the peace of this State, the Government, and dignity of the same.

FIFTH COUNT

FELONY MURDER

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Felony Murder by causing the death of J.C., while said PAUL CANEIRO, was engaged in the commission of, and/or an attempt to commit, and/or, flight after committing or attempting to commit the crime of Arson, contrary to the provisions of N.J.S.A. 2C:11-3a(3), and against the peace of this State, the Government, and dignity of the same.

SIXTH COUNT

FELONY MURDER

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Felony Murder by causing the death of S.C., while said PAUL CANEIRO, was engaged in the

commission of, and/or an attempt to commit, and/or, flight after committing or attempting to commit the crime of Arson, contrary to the provisions of N.J.S.A. 2C:11-3a(3), and against the peace of this State, the Government, and dignity of the same.

SEVENTH COUNT

AGGRAVATED ARSON

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Aggravated Arson, by starting a fire thereby purposely or knowingly placing J.C. and/or S.C. in danger of death or bodily injury and/or with the purpose of destroying a building or structure of another, to wit: 15 Willow Brook Road, Colts Neck, New Jersey, belonging to K.C. and/or J.C., contrary to the provisions of N.J.S.A. 2C:17-1a, and against the peace of this State, the Government, and dignity of the same.

EIGHTH COUNT

AGGRAVATED ARSON

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Ocean, County of Monmouth, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Aggravated

Arson by, starting a fire thereby purposely or knowingly placing S.C. and/or M.C. and/or K.C. in danger of death or bodily injury or with the purpose of destroying a building or structure of another, to wit: 27 Tilton Drive, Ocean, New Jersey, belonging to P.C. and/or S.C., contrary to the provisions of N.J.S.A. 2C:17-1a, and against the peace of this State, the Government, and dignity of the same.

NINTH COUNT

POSSESSION OF A WEAPON FOR AN UNLAWFUL PURPOSE

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Weapon for an Unlawful Purpose, by possessing a weapon, to wit: a handgun, with a purpose to use it unlawfully against the persons of K.C. and/or J.C. and/or J.C. and/or S.C., contrary to the provisions of N.J.S.A. 2C:39-4(a), and against the peace of this State, the Government, and dignity of the same.

TENTH COUNT

UNLAWFUL POSSESSION OF A WEAPON

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, County of Monmouth, and within the

jurisdiction of this Court, did commit the crime of Unlawful Possession of a Weapon, by knowingly possessing a handgun without first having obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this State, the Government, and dignity of the same.

ELEVENTH COUNT

POSSESSION OF A WEAPON FOR AN UNLAWFUL PURPOSE

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Possession of a Weapon for an Unlawful Purpose, by possessing a weapon, to wit: a knife, with a purpose to use it unlawfully against the person of J.C. and/or J.C. and/or S.C., contrary to the provisions of N.J.S.A. 2C:39-4(d), and against the peace of this State, the Government, and dignity of the same.

TWELFTH COUNT

UNLAWFUL POSSESSION OF A WEAPON

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Unlawful

Possession of a Weapon, by knowingly possessing a weapon, to wit: a knife, under circumstances not manifestly appropriate for such lawful uses as it may have, contrary to the provisions of N.J.S.A. 2C:39-5d, and against the peace of this State, the Government, and dignity of the same.

THIRTEENTH COUNT

THEFT OF MOVABLE PROPERTY

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about diverse dates between January 1, 2017 through November 19, 2018, in or about various municipalities in the County of Monmouth including but not limited to Township of Ocean and/or the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Theft, by unlawfully taking, or exercising unlawful control over, movable property of another, to wit: money, valued at \$75,000 or more, belonging to K.C. and/or J.C. and/or J.C. and/or S.C., with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3a, and against the peace of this State, the Government, and dignity of the same.

FOURTEENTH COUNT

MISAPPLICATION OF ENTRUSTED PROPERTY

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about diverse dates between January 1, 2017 through

November 19, 2018, in or about various municipalities in the County of Monmouth including but not limited to Township of Ocean and/or the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Misapplication of Entrusted Property, by purposely or knowingly applying or disposing of property that was entrusted to them as a fiduciary, to wit: money, valued at \$78,180, belonging to K.C. and/or J.C. and/or J.C. and/or S.C. upon agreement, in a manner which they knew was unlawful or involved substantial risk of loss or detriment to the owner, contrary to the provisions of N.J.S.A. 2C:21-15, and against the peace of this State, the Government, and dignity of the same.

FIFTEENTH COUNT

HINDERING APPREHENSION OF ONESELF

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck and/or the Township of Ocean, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Hindering Apprehension of Oneself, by, with purpose to hinder his/her own detention, apprehension, investigation, prosecution, conviction, or punishment for the crime of Murder, by suppressing, by way of concealment or destruction, any evidence of the crime or tamper with a document or other source of information, regardless of its admissibility in evidence, which might have aided in his discovery or apprehension or in the

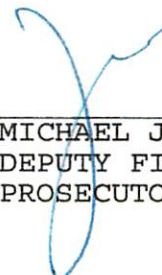
lodging of a charge against him, contrary to the provisions of N.J.S.A. 2C:29-3b, and against the peace of this State, the Government, and dignity of the same.

SIXTEENTH COUNT

HINDERING APPREHENSION OF ONESELF

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Hindering Apprehension of Oneself, by, with purpose to hinder his/her own detention, apprehension, investigation, prosecution, conviction, or punishment for the crimes of Theft and/or Misapplication of Entrusted Property, by preventing or obstruct by means of force or intimidation anyone from performing an act which might have aided in his discovery or apprehension or in the lodging of a charge against him, contrary to the provisions of N.J.S.A. 2C:29-3b, and against the peace of this State, the Government, and dignity of the same.



MICHAEL J. WOJCIECHOWSKI
DEPUTY FIRST ASSISTANT
PROSECUTOR

Endorsed:

Foreperson

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

CASE NO. 18-04915
INDICTMENT NO. 19-02-00283

THE STATE OF NEW JERSEY :
Plaintiff, :
v. : NOTICE OF AGGRAVATING
PAUL CANEIRO, : FACTORS
Defendant. :

AGGRAVATING FACTORS AS TO COUNT ONE

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths, present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, did commit the crime of Murder, by purposely or knowingly causing the death of K.C., or by purposely or knowingly causing serious bodily injury resulting in the death of K.C., by his own hand, as alleged in Count One of the Indictment and that the following aggravating factors are present with regard to Count One of the Indictment:

1. PAUL CANEIRO committed the murder as consideration for the receipt, or in expectation of the receipt of anything of pecuniary value, pursuant to N.J.S.A. 2C:11-3b(4)(d), and against the peace of this State, the Government, and dignity of same.

2. The murder of K.C. was committed for the purpose of escaping detection, apprehension, trial, punishment or confinement for another offense committed by PAUL CANEIRO or another, pursuant to N.J.S.A. 2C:11-3b(4)(f), and against the peace of this State, the Government, and dignity of same.
3. The murder of K.C. was committed while PAUL CANEIRO was engaged in the commission of, or an attempt to commit, or flight after committing or attempting to commit murder, pursuant to N.J.S.A. 2C:11-3b(4)(g), and against the peace of this State, the Government, and dignity of same.

AGGRAVATING FACTORS AS TO COUNT TWO

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths, present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, did commit the crime of Murder, by purposely or knowingly causing the death of J.C., or by purposely or knowingly causing serious bodily injury resulting in the death of J.C., by his own hand, as alleged in Count Two of the Indictment and that the following aggravating factors are present with regard to Count Two of the Indictment:

1. PAUL CANEIRO committed the murder as consideration for the receipt, or in expectation of the receipt of anything of pecuniary value, pursuant to N.J.S.A. 2C:11-3b(4)(d), and against the peace of this State, the Government, and dignity of same.

2. The murder of J.C. was committed for the purpose of escaping detection, apprehension, trial, punishment or confinement for another offense committed by the defendant or another, pursuant to N.J.S.A. 2C:11-3b(4)(f), and against the peace of this State, the Government, and dignity of same.

3. The murder of J.C. was committed while PAUL CANEIRO was engaged in the commission of, or an attempt to commit, or flight after committing or attempting to commit murder, pursuant to N.J.S.A. 2C:11-3b(4)(g), and against the peace of this State, the Government, and dignity of same.

AGGRAVATING FACTORS AS TO COUNT THREE

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths, present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, did commit the crime of Murder, by purposely or knowingly causing the death of J.C., or by purposely or knowingly causing serious bodily injury resulting in the death of J.C., by his own hand, as alleged in Count Three of the Indictment and that the following aggravating factors are present with regard to Count Three of the Indictment:

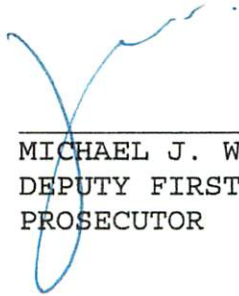
1. PAUL CANEIRO committed the murder as consideration for the receipt, or in expectation of the receipt of anything of pecuniary value, pursuant to N.J.S.A. 2C:11-3b(4)(d), and against the peace of this State, the Government, and dignity of same.

2. The murder of J.C. was committed for the purpose of escaping detection, apprehension, trial, punishment or confinement for another offense committed by the defendant or another, pursuant to N.J.S.A. 2C:11-3b(4)(f), and against the peace of this State, the Government, and dignity of same.
3. The murder of J.C. was committed while PAUL CANEIRO was engaged in the commission of, or an attempt to commit, or flight after committing or attempting to commit murder, pursuant to N.J.S.A. 2C:11-3b(4)(g), and against the peace of this State, the Government, and dignity of same.
4. J.C. was less than 14 years old, pursuant to N.J.S.A. 2C:11-3b(4)(k), and against the peace of this State, the Government, and dignity of same.

AGGRAVATING FACTORS AS TO COUNT FOUR

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths, present that PAUL CANEIRO, on or about November 20, 2018, in or about the Township of Colts Neck, County of Monmouth, did commit the crime of Murder, by purposely or knowingly causing the death of S.C., or by purposely or knowingly causing serious bodily injury resulting in the death of S.C., by his own hand, as alleged in Count Four of the Indictment and that the following aggravating factors are present with regard to Count Four of the Indictment:

1. PAUL CANEIRO committed the murder as consideration for the receipt, or in expectation of the receipt of anything of pecuniary value, pursuant to N.J.S.A. 2C:11-3b(4)(d), and against the peace of this State, the Government, and dignity of same.
2. The murder of S.C. was committed for the purpose of escaping detection, apprehension, trial, punishment or confinement for another offense committed by the defendant or another, pursuant to N.J.S.A. 2C:11-3b(4)(f), and against the peace of this State, the Government, and dignity of same.
3. The murder of S.C. was committed while PAUL CANEIRO was engaged in the commission of, or an attempt to commit, or flight after committing or attempting to commit murder, pursuant to N.J.S.A. 2C:11-3b(4)(g), and against the peace of this State, the Government, and dignity of same.
4. S.C. was less than 14 years old, pursuant to N.J.S.A. 2C:11-3b(4)(k), and against the peace of this State, the Government, and dignity of same.



MICHAEL J. WOJCIECHOWSKI
DEPUTY FIRST ASSISTANT
PROSECUTOR

Endorsed:

Foreperson

COMPLAINT - WARRANT

COMPLAINT NUMBER				THE STATE OF NEW JERSEY	
1337	W	2019	000397	VS.	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	PAUL J CANEIRO	
OCEAN TOWNSHIP MUNICIPAL COURT				ADDRESS:	
399 MONMOUTH RD				27 TILTON DRIVE	
OAKHURST NJ 07755-0000				TINTON FALLS NJ 07712-0000	
732-531-5005 COUNTY OF: MONMOUTH					
# of CHARGES 1	CO-DEFTS	POLICE CASE #: MCP1800780		DEFENDANT INFORMATION	
COMPLAINANT DEBRA BASSINDER		NAME: 132 JERSEYVILLE AVE		SEX: M EYE COLOR: BLUE DOB: 12/30/1966	
FREEHOLD NJ 07728				DRIVER'S LIC. #: SOCIAL SECURITY #: XXX-XX-X SBI #: TELEPHONE #: LIVSCAN PCN #:	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **11/06/2012** in **OCEAN TWP**, **MONMOUTH County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, KNOWINGLY MAKES, OR CAUSES TO BE MADE, A FALSE, FICTITIOUS, FRAUDULENT, OR MISLEADING STATEMENT OF MATERIAL FACT IN, OR OMITS A MATERIAL FACT FROM, OR CAUSES A MATERIAL FACT TO BE OMITTED FROM, ANY RECORD, BILL, CLAIM OR OTHER DOCUMENT, IN WRITING, ELECTRONICALLY, ORALLY OR IN ANY OTHER FORM, THAT A PERSON ATTEMPTS TO SUBMIT, SUBMITS, CAUSES TO BE SUBMITTED, OR ATTEMPTS TO CAUSE TO BE SUBMITTED AS PART OF, IN SUPPORT OF OR OPPOSITION TO OR IN CONNECTION WITH: (1) A CLAIM FOR PAYMENT, REIMBURSEMENT OR OTHER BENEFIT PURSUANT TO AN INSURANCE POLICY, OR FROM AN INSURANCE COMPANY OR THE UNSATISFIED CLAIM AND JUDGMENT FUND LAW, SPECIFICALLY BY MAKING FRAUDULENT STATEMENTS TO SUN LIFE FINANCIAL INSURANCE COMPANY, UNUM INSURANCE COMPANY, STATE OF NEW JERSEY REGARDING THE INSURANCE POLICY OF PAUL J. CANEIRO, IN VIOLATION OF N.J.S.A. 2C:21-4.6(1), A CRIME OF THE SECOND DEGREE.

in violation of:

Original Charge	1) 2C:21-4.6A	2)	3)
Amended Charge			

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: **DEBRA BASSINDER** Date: **07/16/2019**

You will be notified of your **Central First Appearance/CJP** date to be held at the **Superior Court** in the county of **MONMOUTH** at the following address: **MONMOUTH COUNTY COURTS**
71 MONUMENT PARK PO BOX 1271 FREEHOLD NJ 07728-0000
Date of Arrest: **Appearance Date:** **Time:** **Phone: 732-677-4500**

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause **IS NOT** found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator _____ Date _____ Signature of Judge _____ Date _____

☒ Probable cause **IS** found for the issuance of this complaint. **GLORIA WALKER JUDICIAL OFFICER** **07/16/2019**
Signature and Title of Judicial Officer Issuing Warrant Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: _____ by: _____
(if different from judicial officer that issued warrant)

☐ Domestic Violence – Confidential ☐ Related Traffic Tickets or Other Complaints ☐ Serious Personal Injury/ Death Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
- ☐ No possession firearms/weapons
- ☐ Other (specify):

ORIGINAL

Affidavit of Probable Cause

COMPLAINT NUMBER			
1337	W	2019	000397
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
OCEAN TOWNSHIP MUNICIPAL COURT 399 MONMOUTH RD OAKHURST NJ 07755-0000 732-531-5005 COUNTY OF: MONMOUTH			
# of CHARGES 1	CO-DEFTS	POLICE CASE #: MCP1800780	
COMPLAINANT DEBRA BASSINDER NAME: 132 JERSEYVILLE AVE FREEHOLD NJ 07728		DEFENDANT INFORMATION SEX: M EYE COLOR: BLUE DOB: 12/30/1966 DRIVER'S LIC. #. DL STATE: SOCIAL SECURITY #: xxx-xx-x SBI #: TELEPHONE #: () LIVESCAN PCN #:	

THE STATE OF NEW JERSEY

VS.

PAUL J CANEIRO

ADDRESS: 27 TILTON DRIVE

TINTON FALLS

NJ 07712-0000

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:

On July 16, 2019, a Monmouth County Grand Jury handed up an indictment for Paul Caneiro, N.J.S.A.2C:21-4.6(A). Please refer to Indict #19-07-01038.

Affidavit of Probable Cause

Affidavit of Probable Cause

COMPLAINT NUMBER

1337

W

2019

000397

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

THE STATE OF NEW JERSEY

VS.

PAUL J CANEIRO

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

Please refer to Indict #19-07-01038.

3. If victim was injured, provide the extent of the injury:

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DEBRA BASSINDER LAW ENFORCEMENT OFFICER

Date: 07/16/2019

Affidavit of Probable Cause

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

THE STATE OF NEW JERSEY :

Plaintiff, :

v. :

Indictment No. 19-07-01038
Case No. 19-02852

PAUL CANEIRO, :

Defendant. :

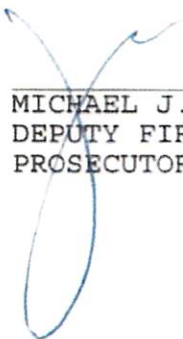
FIRST COUNT

INSURANCE FRAUD

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that, PAUL CANEIRO, on or about and between November 6, 2012 through July 9, 2019, in or about the Township of Ocean, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Insurance Fraud, by knowingly making or causing to be made, five or more false, fictitious, fraudulent or misleading statements of material fact in and/or omitting a material fact from any record, bill, claim or other document in writing, electronically, orally or in any other form, that a person attempts to submit, submits, causes to be submitted or attempts to cause to be submitted as part of, in support of or opposition to or in connection with a claim for payment, reimbursement or other benefit pursuant to an insurance policy or from an insurance company, to wit: PAUL CANEIRO received disability payments from Sun Life Financial insurance company, and/or Unum Insurance company, and/or the State of New Jersey, from an

automobile accident that occurred on November 6, 2012, and while receiving payments from those insurers, he continued to work at Jay Martin Consulting and EcoStar, and he continued to receive income from those companies by way of payments to his wife, S.C., who did not work for either company, contrary to the provisions of N.J.S.A. 2C:21-4.6, and against the peace of this State, the Government, and dignity of the same.



MICHAEL J. WOJCIECHOWSKI
DEPUTY FIRST ASSISTANT
PROSECUTOR

Endorsed:

Foreperson