



State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF CRIMINAL JUSTICE
PO Box 085
TRENTON, NJ 08625-0085
TELEPHONE: (609) 984-6500

RICHARD J. CODEY
Acting Governor

PETER C. HARVEY
Attorney General

VAUGHN L. MCKOY
Director

July 14, 2005

VIA OVERNIGHT MAIL

Robert E. Lytle, Esq.
Szaferman, Lakind, Blumstein, Blader, Lehmann & Goldshore, P.C.
Suite 104
101 Grovers Mill Road
Lawrenceville, New Jersey 08648

Re: State v. Sandra Coia
Summons Nos. S-2004-112250 and S-2004-112253

Dear Mr. Lytle:

This letter sets forth the full and complete plea agreement in the above referenced matter between your client, Sandra Coia, ("defendant") and the Division of Criminal Justice for the State of New Jersey. The following are the terms of the plea agreement:

The State will accept a guilty plea from defendant to Count One of an Accusation to be filed by the State, charging defendant with one count of third degree Pattern of Official Misconduct, in violation of N.J.S.A. 2C:30-7. If defendant enters a guilty plea to this charge, is sentenced on this charge and fully complies with the terms specified below, the State will agree to dismiss the charges contained in Summons numbers S-2004-112250 and S-2004-112253 and to recommend that defendant be sentenced to a term of probation set by the Court, with the condition that she serve 364 days in the county jail as a condition of that probation.

As a condition of the plea arrangement, defendant shall pay restitution to the New Jersey Department of Education in the amount of \$21,230, either: (1) on or before the date of sentencing or (2) in the case of a demonstrated inability to pay any portion of the restitution on or before sentencing, pursuant to a plan submitted to the Court with the consent of both parties.

Defendant is aware that the sentencing Court may impose a criminal fine of up to \$15,000.00.



Robert E. Lytle, Esq.
July 14, 2005
Page 2

As a condition of the plea arrangement, defendant shall also voluntarily forfeit any and all public employment and shall further agree to be forever disqualified from holding any office or position of honor, trust or profit under the State or any of its administrative or political subdivisions, pursuant to N.J.S.A. 2C:51-2. Defendant agrees to execute a Consent Order to this effect at the time of her plea.

Defendant agrees that she will not make application for admission to the Pretrial Intervention Program.

It is understood that the sentencing Court: (1) will order a mandatory assessment of \$50.00 per conviction pursuant to N.J.S.A. 2C:43-3.1; and (2) a mandatory assessment of \$75.00 per conviction for crimes taking place after September 2, 1993, pursuant to N.J.S.A. 2C:43-3.2.

It is further understood that this plea agreement is limited to the Division of Criminal Justice and cannot bind federal prosecuting authorities. It is understood that this agreement does not prohibit the State, any agency thereof, or any third party from instituting any civil proceedings directly or indirectly involving defendant.

This plea offer is effective until July 31, 2005, and is thereafter withdrawn by the State.

No additional promises, agreements, or conditions have been entered into with the defendant other than those set forth in this letter, and none will be entered into unless in writing and signed by both parties.

Very truly yours,

ANTHONY A. PICIONE
Deputy Attorney General
Special Prosecutions Bureau
Division of Criminal Justice

I have read this letter and have discussed its terms with my attorney. I understand its terms and I hereby acknowledge that it fully sets forth my agreement with the Division of Criminal Justice. There have been no additional promises or representations made to me by any officials or employees of the State or by my attorney in connection with this matter. Pursuant to R. 3:13-3(a), I acknowledge that I have been permitted to inspect and copy any relevant material to the extent

Robert E. Lytle, Esq.
July 14, 2005
Page 3

requested by me.

Dated:

Sandra Coia

Dated:

Robert E. Lytle, Esq.
Counsel for Sandra Coia