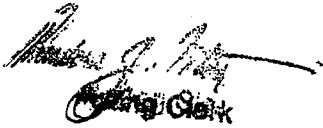


**SUPERIOR COURT OF N.J.  
FILED**

**AUG 14 2007**



*[Handwritten Signature]*  
Clerk

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 542-07-27

Superior Court

Docket Number 07-08-00113-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

VITOR PEDREIRAS )

also known as )

VICTOR PEDREIRAS )

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

COUNT ONE

(Conspiracy - Second Degree)

VITOR PEDREIRAS

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between in or about February 2004 and in or about December 2005, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, at the City of Hillside, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Bribery in Official And Political Matters, Official Misconduct, Theft By Deception, Tampering With Public Records or Information, Falsifying or Tampering with

Records, and/or Witness Tampering, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crime(s), or

B. One or more of them knowingly would aid in the planning, solicitation or commission of said crime(s), that is:

1. Bribery in Official or Political Matters, in that one or more of them would knowingly directly or indirectly offer, confer or agree to confer upon a public servant, a benefit, that is money in excess of \$200, as consideration for the violation of the public servant's official duty as a Senior Field Representative of the New Jersey Department of Community Affairs, or as consideration for the performance of her official duty as a public servant, contrary to the provisions of N.J.S.A. 2C:27-2(c), (d);

2. Official Misconduct, in that one or more of them would aid, agree or attempt to aid a public servant, acting with the purpose to obtain a benefit for herself or another in excess of \$200 or to injure or to deprive another of a benefit in excess of \$200, in committing acts relating to her office, but constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner or in refraining from performing a duty imposed upon her by law or clearly inherent in the nature of her office and the said public servant, then and

there being a public servant, to wit: a Senior Field Representative of the New Jersey Department of Community Affairs, having thereby the official functions and duties, among others, to submit applications for financial benefits under the Homeless Prevention Program, to ensure that applications for financial benefits under the Homeless Prevention Program are accurately and completely prepared and submitted pursuant to program deadlines, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did, after receiving funds in excess of \$200, from the said VITOR PEDREIRAS and other persons whose identities are both known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, falsify one or more Homeless Prevention Program applications, or submit one or more Homeless Prevention Program applications containing false information or false supporting documentation, contrary to the provisions of N.J.S.A. 2C:30-2;

3. Theft by Deception, in that one or more them would purposely obtain in excess of \$500 from the State of New Jersey, through the New Jersey Department of Community Affairs, by deception, that is, by creating or reinforcing a false impression that one or more Homeless Prevention Program applicants were the victims of fires, or regarding the said applicants' personal, domicile, employment or financial information, by submitting

false information regarding the same in one or more applications for Homeless Prevention Program benefits, or by submitting falsified documents or documents containing false statements of fact in support of said Homeless Prevention program applications, contrary to the provisions of N.J.S.A. 2C:20-4;

4. Tampering with Public Records or Information, in that one or more of them, with purpose to defraud or injure, would make a false entry in a record, document or thing belonging to, received or kept by, the government for information or record, or required by law to be kept by others for information of the government, or make, present, offer for filing or use any record, document or thing knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said VITOR PEDREIRAS and other persons whose identities are both known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, knowing the same to be false, did make false entries in one or more applications for Homeless Prevention Program benefits, or did make, present, offer for filing or use one or more falsified documents or documents containing false statements of fact in support of said applications for Homeless Prevention Program benefits, contrary to the provisions of

N.J.S.A. 2C:28-7(a);

5. Falsifying Records, in that one or more of them, with purpose to deceive or injure another or to conceal a wrongdoing, knowing it to contain a false statement or information, would utter a writing or record, that is, one or more applications for Homeless Prevention Program benefits, or documents submitted in support of applications for Homeless Prevention Program benefits, contrary to the provisions of N.J.S.A. 2C:21-4(a); and/or

6. Witness Tampering, in that one or more of them, believing that an official proceeding or investigation was pending or about to be instituted, knowingly would attempt to induce or otherwise cause a witness to testify or inform falsely, contrary to the provisions of N.J.S.A. 2C:28-5(a).

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

COUNT TWO

(Bribery in Official And Political Matters - Second Degree)

VITOR PEDREIRAS

between in or about February 2004 and in or about July 2004, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer or agree to confer upon a public servant, to wit: a Senior Field Representative of the New Jersey Department of Community Affairs, a benefit, that is money in excess of \$200, as consideration for the violation of her official duty as a public servant, or as consideration for the performance of her official duty as a public servant, contrary to the provisions of N.J.S.A. 2C:27-2(c), (d) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT THREE

(Official Misconduct - Second Degree)

VITOR PEDREIRAS

between in or about February 2004 and in or about July 2004, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, at the City of Hillside, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did aid, agree or attempt to aid a public servant in committing the offense of official misconduct, in that the said VITOR PEDREIRAS did aid, agree or attempt to aid a public servant, acting with the purpose to obtain a benefit for herself or another in excess of \$200 or to injure or to deprive another of a benefit in excess of \$200, in committing acts relating to her office, but constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, and the said public servant, then and there being a public servant, to wit: a Senior Field Representative of the New Jersey Department of Community Affairs, having thereby the official functions and duties, among others, to submit applications for financial benefits under the Homeless Prevention Program, to ensure that applications for financial benefits under the Homeless Prevention Program are accurately and completely prepared and submitted pursuant to

program deadlines, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did accept money in excess of \$200 from the said VITOR PEDREIRAS and/or other persons whose identities are both known and unknown to the Grand Jurors in exchange for falsifying Homeless Prevention Program applications, or submitting Homeless Prevention Program applications containing false information and/or supporting documents, with the purpose to secure a benefit to herself or another in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.



COUNT FOUR

(Official Misconduct - Second Degree)

VITOR PEDREIRAS

between in or about February 2004 and in or about December 2005, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, at the City of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said VITOR PEDREIRAS, acting with the purpose to obtain a benefit for himself or another in excess of \$200 or to injure or to deprive another of a benefit, did refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and the said VITOR PEDREIRAS, then and there being a public servant, to wit: a police officer in the Township of Hillside, having thereby the official functions and duties, among others, to obey and enforce the laws of the State of New Jersey, to report violations of the laws of the State of New Jersey to law enforcement authorities, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did knowingly refrain from reporting, investigating, detecting and/or arresting a violation of the criminal laws of the State of New Jersey, in that he knowingly: (1) did allow, permit, encourage, aid, assist and facilitate the payment money in excess of \$200 to a public

servant in exchange for the public servant falsifying Homeless Prevention Program applications, or submitting Homeless Prevention Program applications containing false information; (2) did obtain and/or allow, permit, encourage, aid, assist and facilitate the obtaining of funds in excess of \$500 from the State of New Jersey, through the New Jersey Department of Community Affairs, by deception, that is by creating or reinforcing the false impression on Homeless Prevention Program applications, and supporting documents attached to said applications, that the applicants were victims of fires and/or that the applicants had certain employment, financial or domicile circumstances; (3) did allow, permit, encourage, aid, assist and facilitate the falsification and utterance of false Homeless Prevention Program applications, falsified documents, or documents containing false statements of fact in support of said Homeless Prevention Program applications, with purpose to defraud or injure the New Jersey Department of Community Affairs; and/or (4) did, believing that an official proceeding or investigation was pending or about to be instituted, knowingly attempt to induce or otherwise cause another person whose identity is known to the Grand Jurors to testify or inform falsely or to volunteer false information to a law enforcement officer, all with the purpose to secure a benefit to himself or another in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2, and against

the peace of this State, the government and dignity of same.

COUNT FIVE

(Theft By Deception - Third Degree)

VITOR PEDREIRAS

between in or about February 2004 and in or about July 2004, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, at the City of Hillside, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did obtain in excess of \$500, from the State of New Jersey, through the New Jersey Department of Community Affairs, by deception, by creating or reinforcing the false impression on one or more Homeless Prevention Program applications, and supporting documents attached to said applications, for certain applicants, whose identities are known to the Grand Jurors: (1) that the said applicants were victims of fires or (2) that the applicants had certain personal, employment, financial or domicile circumstances, and did submit the said false Homeless Prevention Program applications, falsified documents, or documents containing false statements of fact in support of said Homeless Prevention Program applications, thereby obtaining for himself or another Homeless Prevention Program benefits in excess of \$500;

WHEREAS, in truth and in fact, as the said VITOR PEDREIRAS well knew, the aforesaid information contained in one or more applications for Homeless Prevention Program benefits or

documents submitted in support of Homeless Prevention program applications was false, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT SIX

(Tampering With Public Records or Information - Third Degree)

VITOR PEDREIRAS

between in or about February 2004 and in or about July 2004, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, at the City of Hillside, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in a record, document or thing belonging to, received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said VITOR PEDREIRAS, knowing the same to be false, did make a false entry in one or more applications for Homeless Prevention Program benefits, contrary to the provisions of N.J.S.A. 2C:28-7(a)(1) and N.J.S.A. 2C:2-6; and against the peace of this State, the government and dignity of same.

COUNT SEVEN

(Tampering With Public Records or Information - Third Degree)

VITOR PEDREIRAS

between in or about February 2004 and in or about July 2004, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, at the City of Hillside, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said VITOR PEDREIRAS, knowing the same to be false, did make, present, offer for filing or use one or more falsified social security cards, falsified reports, letters containing false statements of fact or reports containing false statements of fact in support of applications for Homeless Prevention Program benefits, contrary to the provisions of N.J.S.A. 2C:28-7(a)(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT EIGHT

(Falsifying Records - Fourth Degree)

VITOR PEDREIRAS

between in or about February 2004 and in or about July 2004, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, at the City of Hillside, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to deceive or injure another or to conceal a wrongdoing, knowing it to contain a false statement or information, did utter a writing or record, that is, one or more applications for Homeless Prevention Program benefits, and/or documents submitted in support of applications for Homeless Prevention Program benefits, contrary to the provisions of N.J.S.A. 2C:21-4(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.



COUNT NINE

(Witness Tampering - Third Degree)

VITOR PEDREIRAS

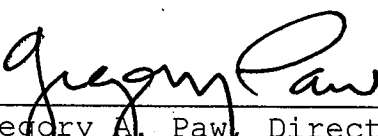
between in or about July 2004 and in or about December 2005, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, at the City of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, knowingly did attempt to induce or otherwise cause another person whose identity is known to the Grand Jurors to testify or inform falsely, contrary to the provisions of N.J.S.A. 2C:28-5(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT TEN

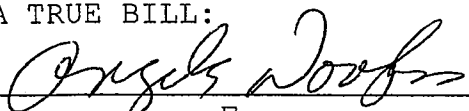
(Hindering Apprehension or Prosecution - Third Degree)

VITOR PEDREIRAS

between in or about July 2004 and in or about December 2005, at the City of Elizabeth, in the County of Union, at the Township of Union, in the County of Union, at the City of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, with purpose to hinder his own apprehension, prosecution, conviction or punishment and/or the apprehension, prosecution, conviction or punishment of another for a crime of the second degree, did solicit another, whose identity is known to the Grand Jurors, to volunteer false information to a law enforcement officer, contrary to the provisions of N.J.S.A. 2C:29-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

  
\_\_\_\_\_  
Gregory A. Paw, Director  
Division of Criminal Justice

A TRUE BILL:

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

Dated: 8-14-07

SUPERIOR COURT OF N.J.  
FILED

AUG 14 2007

*[Handwritten signature]*  
Clerk

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ542-07-27  
Superior Court 07-08-00113-S  
Docket Number

STATE OF NEW JERSEY )  
  
v. )  
  
VITOR PEDREIRAS )  
also known as )  
VICTOR PEDREIRAS )

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 14th day of August, 2007, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.

*[Handwritten signature]*  
Linda R. Feinberg, A.J.S.C.