

FILED

FEB 11 2009

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 568-09-6

Superior Court 09-02-00032-S

Docket Number _____

STATE OF NEW JERSEY)

v.)

ISAIAH DAVIS)

INDICTMENT

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

COUNT ONE

(False Representation for a Government Contract - Second Degree)

ISAIAH DAVIS

between on or about March 10, 2003 and on or about February 19, 2004, at the City of Cinnaminson, in the County of Burlington, at the Township of Mount Holly, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did make a material representation that was false in connection with the negotiation, award or performance of a government contract valued in excess of \$25,000.00; that is the said ISAIAH DAVIS knowingly submitted false information contained in Laidlaw Transit Services, Inc.'s invoices, manifest cover sheets, daily drivers manifests and/or related documentation to the Burlington County Transportation Department and/or the County of Burlington in connection with the negotiation, award or performance of the

Operation of The Burlington County Transportation System for the Elderly and Adult Disabled, Contract No. CPU-01-0061, contrary to the provisions of N.J.S.A. 2C:21-34b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(False Contract Payment Claims for a Government
Contract - Second Degree)

ISAAH DAVIS

between on or about March 10, 2003 and on or about February 19, 2004, at the City of Cinnaminson, in the County of Burlington, at the Township of Mount Holly, in the County of Burlington, elsewhere and within the jurisdiction of this Court, did knowingly submit to the Burlington County Transportation Department and/or the County of Burlington, a government entity, one or more claims in excess of \$25,000.00 for payment for performance of a government contract between the Burlington County Transportation System/County of Burlington and Laidlaw Transit Services, Inc., Contract No. CPU-01-0061, that is, Invoice# 9620303BCTS, dated April 2, 2003; Invoice# 9620403BCTS, dated May 2, 2003; Invoice# 9620503BCTS, dated June 2, 2003; Invoice# 9620603BCTS, dated July 2, 2003; Invoice# 9620703BCTS, dated August 4, 2003; Invoice# 9620803BCTS, dated September 4, 2003; Invoice# 9620903BCTS, dated October 4, 2003; Invoice# 9621003BCTS, dated November 4, 2003; Invoice# 9621103BCTS, dated December 2, 2003; Invoice# 9621203BCTS, dated January 4, 2004; and/or Invoice# 9620104BCTS, dated February 4, 2004, knowing same to be false, fictitious or fraudulent, contrary to the provisions of N.J.S.A. 2C:21-34a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft By Deception - Third Degree)

ISAIAH DAVIS

between on or about March 10, 2003 and on or about February 19, 2004, at the City of Cinnaminson, in the County of Burlington, at the Township of Mount Holly, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, purposely did obtain funds in excess of \$500 from the Burlington County Transportation Department and/or the County of Burlington by deception, that is by creating or reinforcing the false impression that Laidlaw Transit Services, Inc. provided a specific number of transportation trips under a contract between the Burlington County Transportation System/County of Burlington and Laidlaw Transit Services, Inc., Contract No. CPU-01-0061, by submitting false information contained in one or more invoices, manifest cover sheets, daily drivers manifests and/or related documentation to the Burlington County Transportation Department, thereby obtaining for himself or another funds in excess of \$500, to wit: approximately \$32,956.19.

WHEREAS, in truth and fact, as the said ISAIAH DAVIS well knew, the aforesaid information contained in the invoices, manifest cover sheets, daily drivers manifests and/or related documentation 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 the same.

COUNT FOUR

(Tampering with Public Records or False Information-Third Degree)

ISAIAH DAVIS

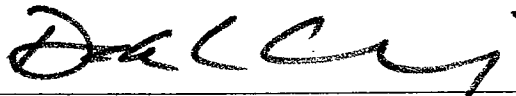
between on or about March 10, 2003 and on or about February 19, 2004, at the City of Cinnaminson, in the County of Burlington, at the Township of Mount Holly, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make, present, offer 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 ISAIAH DAVIS, knowing the same to be false, did make, present, offer for filing or use, one or more false invoices, manifest cover sheets, daily drivers manifests and/or related documentation pertaining to the contract between the Burlington County Transportation System/County of Burlington and Laidlaw Transit Services, Inc., Contract No. CPU-01-0061, 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 FIVE

(Falsifying or Tampering with Records - Fourth Degree)


ISAIAH DAVIS

between on or about March 10, 2003 and on or about February 19, 2004, at the City of Cinnaminson, in the County of Burlington, at the Township of Mount Holly, in the County of Burlington, 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 false invoices, manifest cover sheets, daily drivers manifests and/or related documentation pertaining to the contract between the Burlington County Transportation System/County of Burlington and Laidlaw Transit Services, Inc., Contract No. CPU-01-0061, 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.



Deborah L. Gramiccioni, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 2/11/09

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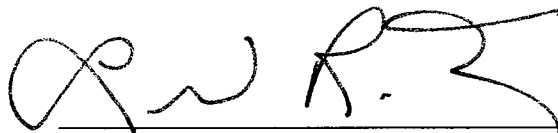
STATE OF NEW JERSEY)
v.)
ISAIAH DAVIS)

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 11th day of February, 2009, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Burlington 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 Burlington for filing.



Linda R. Feinberg, A.J.S.C.