

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ568-09-23

Superior Court

Docket Number 09-04-00071-S

STATE OF NEW JERSEY )

v. )

WESLEY STARR )

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about January 1, 2006, and on or about November 14, 2007, 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 official misconduct, bribery, tampering with public records or information and forgery, did agree together that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or

- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;
  2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and
  3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would make, present, offer for filing or use any record, document or thing knowing it to be

false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2); and

4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

WESLEY STARR

between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said WESLEY STARR, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and the said WESLEY STARR, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from John H. Bennett for the improper issuance of New Jersey Motor Vehicle

Commission Motor Vehicle Titles to John H. Bennett in the names of several individuals and/or businesses, whose identities are known to the Grand Jurors, and/or John H. Bennett did receive a benefit of monies in excess of \$200 for these titles, 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 THREE

(Official Misconduct - Second Degree)

WESLEY STARR

between on or about August 6, 2007, and on or about October 12, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said WESLEY STARR, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and the said WESLEY STARR, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from Rafael Gomez for the improper issuance of a New Jersey Motor Vehicle

Commission Motor Vehicle Title to Rafael Gomez in Rafael Gomez's own name, 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)

WESLEY STARR

between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said WESLEY STARR, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and the said WESLEY STARR, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from Thaer A. Abuhamood for the improper issuance of New Jersey Motor Vehicle



Commission Motor Vehicle Titles to Thaer A. Abuhamood in the names of individuals and/or a business, whose identities are known to the Grand Jurors, and/or Thaer A. Abuhamood did receive a benefit of monies in excess of \$200 for these titles, 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 FIVE

(Official Misconduct - Second Degree)

WESLEY STARR

between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said WESLEY STARR, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and the said WESLEY STARR, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from Corey Tucker for the improper issuance of New Jersey Motor Vehicle

Commission Motor Vehicle Titles to Corey Tucker in the names of individuals and/or a business, whose identities are known to the Grand Jurors, and/or Corey Tucker did receive a benefit of monies in excess of \$200 for these titles, 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 SIX

(Bribery - Second Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said WESLEY STARR, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from John H. Bennett, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to John H. Bennett in the names of several individuals and/or businesses, whose identities are known to the Grand Jurors, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT SEVEN

(Bribery - Second Degree)

WESLEY STARR

who is named as defendant herein, and another person, who is a coconspirator but who is not named as defendant herein, between on or about August 6, 2007, and on or about October 12, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said WESLEY STARR, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said Rafael Gomez, as consideration for the improper issuance of a New Jersey Motor Vehicle Commission Motor Vehicle Title to Rafael Gomez in Rafael Gomez's own name, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT EIGHT

(Bribery - Second Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said WESLEY STARR, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said Thaer A. Abuhamood, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to Thaer A. Abuhamood in the names of individuals and/or a business, whose identities are known to the Grand Jurors, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT NINE

(Bribery - Second Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein; between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said WESLEY STARR, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said Corey Tucker, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to Corey Tucker in the names of individuals and/or a business, whose identities are known to the Grand Jurors, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT TEN

(Tampering with Public Records or Information - Third Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said WESLEY STARR with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use New Jersey Motor Vehicle Commission Applications for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from the Trenton Police Department, whose identity is known to the Grand Jurors, which were submitted to the New Jersey Motor Vehicle Commission with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against



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

COUNT ELEVEN

(Tampering with Public Records or Information - Third Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about May 15, 2006, and on or about October 3, 2006, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said WESLEY STARR with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use New Jersey Motor Vehicle Commission Applications for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from the Trenton Police Department, whose identity is known to the Grand Jurors, which were submitted to the New Jersey Motor Vehicle Commission with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the

government and dignity of the same.

COUNT TWELVE

(Tampering with Public Records or Information - Third Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about March 29, 2006, and on or about January 29, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said WESLEY STARR with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use New Jersey Motor Vehicle Commission Applications for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from Atlantic City Police Department, whose identity is known to the Grand Jurors, which were submitted to the New Jersey Motor Vehicle Commission with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the

government and dignity of the same.

COUNT THIRTEEN

(Tampering with Public Records or Information - Third Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about January 12, 2007, and on or about August 16, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said WESLEY STARR with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use New Jersey Motor Vehicle Commission Applications for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, Police Officer Kevin Ortiz from the Edison Township Police Department, who is a fictitious person, which were submitted to the New Jersey Motor Vehicle Commission with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this

State, the government and dignity of the same.

COUNT FOURTEEN

(Pattern of Official Misconduct - Second Degree)

WESLEY STARR

between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of pattern of official misconduct, in that the said WESLEY STARR, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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 commit two or more acts of official misconduct, each in violation of N.J.S.A. 2C:30-2, as specified in Counts Two, Three, Four and Five of this Indictment, the provisions of which are incorporated as if set forth fully herein, contrary to the provisions of N.J.S.A. 2C:30-7, and against the peace of this State, the government and dignity of same.



COUNT FIFTEEN

(Forgery-Third Degree)

WESLEY STARR

between on or about May 15, 2006, and on or about October 3, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said WESLEY STARR, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership in order to issue New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from the Trenton Police Department, whose identity is known to the Grand Jurors, when, in fact, the law enforcement officer did not authorize these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2), against the peace of this State, the government and dignity of same.

COUNT SIXTEEN

(Forgery-Third Degree)

WESLEY STARR

between on or about May 15, 2006, and on or about September 14, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said WESLEY STARR, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership in order to issue New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from the Trenton Police Department, whose identity is known to the Grand Jurors, when, in fact, the law enforcement officer did not authorize these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2), against the peace of this State, the government and dignity of same.

COUNT SEVENTEEN

(Forgery-Third Degree)

WESLEY STARR

between on or about December 11, 2006, and on or about January 26, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said WESLEY STARR, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership in order to issue New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from Atlantic City Police Department, whose identity is known to the Grand Jurors, when, in fact, the law enforcement officer did not authorize these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2), against the peace of this State, the government and dignity of same.

COUNT EIGHTEEN

(Forgery-Third Degree)

WESLEY STARR

between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said WESLEY STARR, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership in order to issue New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, when, in fact, no law enforcement officer authorized these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2), against the peace of this State, the government and dignity of same.

COUNT NINETEEN

(Forgery-Third Degree)

WESLEY STARR

between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said WESLEY STARR, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership in order to issue New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, when, in fact, no law enforcement officer authorized these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2), against the peace of this State, the government and dignity of same.

COUNT TWENTY

(Forgery-Third Degree)

WESLEY STARR

between on or about October 17, 2006, and on or about December 18, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said WESLEY STARR, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership in order to issue New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from Atlantic City Police Department, whose identity is known to the Grand Jurors, when, in fact, the law enforcement officer did not authorize these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2), against the peace of this State, the government and dignity of same.



Deborah L. Gramiccioni, Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

Date: 4/22/09

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ568-09-23  
Superior Court  
Docket Number 09-04-00071-S

STATE OF NEW JERSEY )

v. )


WESLEY STARR )

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 *22nd* day of *April*, 2009, 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.

  
\_\_\_\_\_  
~~Linda R. Feinberg, A.J.S.C.~~

**Maria Marinari Sypek, P.J.Cr.**

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ568-09-26  
Superior Court  
Docket Number 09-04-00074-S

STATE OF NEW JERSEY     )  
                                  v.                     )  
  ORDER OF VENUE  
THAER A. ABUHAMOOD     )

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

IT IS ORDERED on this 33rd day of April, 2009, 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.



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

**Maria Marinari Sypek, P.J.Cr.**



**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ568-09-26

Superior Court

Docket Number ~~09-04-00074-S~~

STATE OF NEW JERSEY )

v. )

INDICTMENT

THAER A. ABUHAMOOD )

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

COUNT ONE

(Conspiracy - Second Degree)

THAER A. ABUHAMOOD

who is named as a defendant herein, and Wesley Starr, who is a coconspirator but who is not named as a defendant herein, and another individual whose identity is known to the Grand Jurors, and who is a coconspirator, but who is not named as a defendant herein, between on or about January 1, 2006, and on or about November 14, 2007, 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 official misconduct, bribery, tampering with public records or information and forgery, did agree together that:

A. One or more of them would engage in conduct which would

constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or

- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;
  2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and
  3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or

injure another, would make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record N.J.S.A. 2C:28-7a(2); and

4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-a(2).

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

THAER A. ABUHAMOOD

who is named as a defendant herein, and Wesley Starr, who is a coconspirator but who is not named as a defendant herein, and another individual whose identity is known to the Grand Jurors, and who is a coconspirator, but who is not named as a defendant herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said Wesley Starr, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and the said Wesley Starr, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from the said THAER A. ABUHAMOOD for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to THAER A. ABUHAMOOD in the names of THAER A. ABUHAMOOD, KAARS, Inc. and another individual whose identity is known to the Grand Jurors, 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 THREE

(Bribery - Second Degree)

THAER A. ABUHAMOOD

who is named as a defendant herein, and Wesley Starr, who is a coconspirator but who is not named as a defendant herein, and another individual whose identity is known to the Grand Jurors, and who is a coconspirator, but who is not named as a defendant herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said Wesley Starr, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said THAER A. ABUHAMOOD and/or another individual whose identity is known to the Grand Jurors, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to THAER A. ABUHAMOOD in the names of THAER A. ABUHAMOOD, KAARS Inc. and another individual whose identity is known to the Grand Jurors, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the

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

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

THAER A. ABUHAMOOD

who is named as a defendant herein, and Wesley Starr, who is a coconspirator but who is not named as a defendant herein, and another individual whose identity is known to the Grand Jurors, and who is a coconspirator, but who is not named as a defendant herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said Wesley Starr and THAER A. ABUHAMOOD with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use New Jersey Motor Vehicle Commission Applications for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from Trenton Police Department, whose identity is known to the Grand Jurors, which were submitted to the New Jersey Motor Vehicle Commission with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle



Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Forgery-Third Degree)

THAER A. ABUHAMOOD

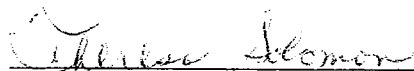
who is named as a defendant herein, and Wesley Starr, who is a coconspirator but who is not named as a defendant herein, and another individual whose identity is known to the Grand Jurors, and who is a coconspirator, but who is not named as a defendant herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said Wesley Starr and THAER A. ABUHAMOOD, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership in order to issue New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from Trenton Police Department, whose identity is known to the Grand Jurors, when, in fact, no law enforcement officer authorized these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2), against the peace of this State, the government

and dignity of same.



Deborah L. Gramiccioni, Director  
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

4/22/09

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ568-09-27  
Superior Court  
Docket Number ~~09-04-00075-S~~

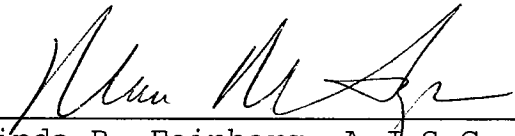
STATE OF NEW JERSEY )  
  
v. )  
  
CARMINE P. MEOLA )

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 *25th* day of *April*, 2009, 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.

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

**Maria Marinari Sypek, P.J.Ct.**

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ568-09-27

Superior Court

Docket Number 09-04-00075-S

STATE OF NEW JERSEY )

v. )

CARMINE P. MEOLA )

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

CARMINE P. MEOLA

who is named as defendant herein, Wesley Starr and John Bennett, who are coconspirators but who are not named as defendants herein, between on or about January 12, 2007, and on or about April 27, 2007, 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 official misconduct, bribery, tampering with public records or information and forgery, did agree together that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or

- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;
  2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and
  3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would make, present, offer for filing or use any record, document or thing knowing it to be

false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(2); and

4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

CARMINE P. MEOLA

who is named as defendant herein, Wesley Starr and John Bennett, who are coconspirators but who are not named as defendants herein, between on or about January 12, 2007, and on or about April 27, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that Wesley Starr, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and Wesley Starr, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or



another, accept monies in excess of \$200 from the said CARMINE P. MEOLA for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to CARMINE P. MEOLA in CARMINE P. MEOLA'S own name, 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 THREE

(Bribery - Second Degree)

CARMINE P. MEOLA

who is named as defendant herein, Wesley Starr and John Bennett, who are coconspirators but who are not named as defendants herein, between on or about January 12, 2007, and on or about April 27, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said Wesley Starr, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said CARMINE P. MEOLA, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to the said CARMINE P. MEOLA in CARMINE P. MEOLA'S own name, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

CARMINE P. MEOLA

who is named as defendant herein, Wesley Starr and John Bennett, who are coconspirators but who are not named as defendants herein, between on or about January 12, 2007, and on or about April 27, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said Wesley Starr and CARMINE P. MEOLA with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use a New Jersey Motor Vehicle Commission Application for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from the Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, which was submitted to the New Jersey Motor Vehicle Commission with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A.

2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.


COUNT FIVE

(Forgery-Third Degree)

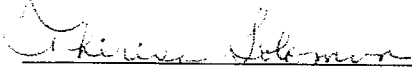
CARMINE P. MEOLA

who is named as defendant herein, Wesley Starr and John Bennett, who are coconspirators but who are not named as defendants herein, between on or about January 12, 2007, and on or about April 27, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said Wesley Starr and CARMINE P. MEOLA, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership to issue a New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from the Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, when, in fact, no law enforcement officer authorized these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:2-6, against

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

  
\_\_\_\_\_  
Deborah L. Gramiccioni, Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

Date: 4/22/09

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ568-09-28

Superior Court

Docket Number 09-04-00076-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

JAMES D. CAMPBELL )

and )

MANUEL RIVERA )

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

COUNT ONE

(Conspiracy - Second Degree)

JAMES D. CAMPBELL

and

MANUEL RIVERA

who are named as defendants herein, and Wesley Starr, who is a co-conspirator but who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about December 11, 2006, and on or about October 19, 2007, 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 official misconduct, bribery, tampering with public

records or information and forgery, did agree together that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or
- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
  - 1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;
  - 2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and



3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record contrary to the provisions of N.J.S.A. 2C:28-7a(2); and
4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

JAMES D. CAMPBELL

and

MANUEL RIVERA

who are named as defendants herein, and Wesley Starr, who is not named as defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about December 11, 2006, and on or about October 19, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that Wesley Starr, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and Wesley Starr, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from the said JAMES D. CAMPBELL and/or MANUEL RIVERA for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to JAMES D. CAMPBELL and/or MANUEL RIVERA in the names of several individuals, whose identities are known to the Grand Jurors, and/or Manny's Auto Sales, and the said JAMES D. CAMPBELL and/or MANUEL RIVERA did receive a benefit of monies in excess of \$200 for these titles, 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 THREE

(Bribery - Second Degree)

JAMES D. CAMPBELL

and

MANUEL RIVERA

who is named as defendant herein, and Wesley Starr, who is not named as defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about December 11, 2006, and on or about October 19, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said Wesley Starr, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Special Titles Unit, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said JAMES D. CAMPBELL and MANUEL RIVERA, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to the said JAMES D. CAMPBELL and/or MANUEL RIVERA in the names of several individuals, whose identities are known to the Grand Jurors, and/or Manny's Auto Sales, contrary to the provisions of

N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

JAMES D. CAMPBELL

and

MANUEL RIVERA

who is named as defendant herein, and Wesley Starr, who is not named as defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about December 11, 2006, and on or about October 19, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, Wesley Starr and the said JAMES D. CAMPBELL and MANUEL RIVERA with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use New Jersey Motor Vehicle Commission Applications for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from the Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, which was submitted to the New Jersey Motor Vehicle Commission

with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Forgery-Third Degree)

JAMES D. CAMPBELL

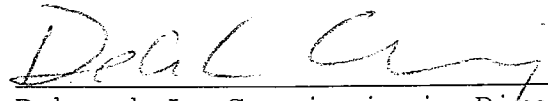
and

MANUEL RIVERA

who is named as defendant herein, and Wesley Starr, who is not named as defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about December 11, 2006, and on or about October 19, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did utter a writing of another which he knew to be forged, that is, the said Wesley Starr and JAMES D. CAMPBELL and MANUEL RIVERA, with purpose to defraud the New Jersey Motor Vehicle Commission, did present Applications for Certification of Ownership to issue New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from the Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, when, in fact, no Officer authorized those acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:2-6, against

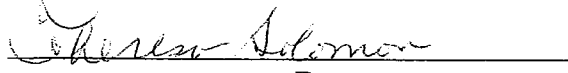


the peace of this State, the government and dignity of same.



Deborah L. Gramiccioni, Director  
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

4/22/09

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ568-09-28  
Superior Court  
Docket Number 09-04-00076-S

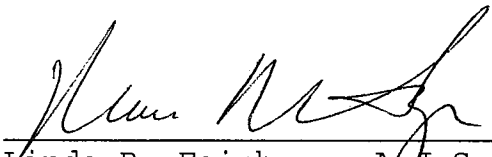
STATE OF NEW JERSEY )  
  
v. )  
  
JAMES D. CAMPBELL )  
  
and )  
  
MANUEL RIVERA )

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 *22nd* day of *April*, 2009, 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.

  
\_\_\_\_\_  
~~Linda R. Feinberg, A.J.S.C.~~

**Maria Marinari Sypek, P.J.Cr.**

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ568-09-30  
Superior Court  
Docket Number 09-04-00078-S

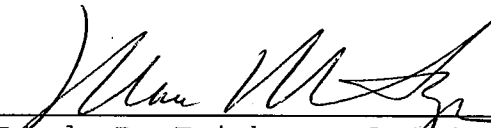
STATE OF NEW JERSEY )  
v. )  
RAYMOND A. SOBERS )  
HONGJAN YUAN )  
DAMON STINSON, JR. )  
and )  
WALDEMAR KOS )

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 *Tuesday* of *April*, 2009, 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.

  
\_\_\_\_\_  
Linda R. Feinberg, A.J.S.C.  
**Maria Marinari Sypek, P.J.Cr.**

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ568-09-30

Superior Court

Docket Number 09-04-00078-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

RAYMOND A. SOBERS )

and )

HONGJAN YUAN )

and )

DAMON STINSON, JR. )

and )

WALDEMAR KOS )

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

COUNT ONE

(Conspiracy - Second Degree)

RAYMOND A. SOBERS

and

HONGJAN YUAN

who are named as defendants herein, and Wesley Starr, who is a coconspirator but who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12,

2007, and on or about June 29, 2007, 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 official misconduct, bribery, tampering with public records or information and forgery, did agree together that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or
- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
  - 1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;
  - 2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a

benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and

3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record N.J.S.A. 2C:28-7a(2); and
4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT TWO

(Conspiracy - Second Degree)

RAYMOND A. SOBERS

and

DAMON STINSON, JR.

who are named as defendants herein, and Wesley Starr, who is a coconspirator but who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about April 24, 2007, and on or about November 14, 2007, 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 official misconduct, bribery, tampering with public records or information and forgery, did agree together that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or
- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
  - 1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or

would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;

2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and
3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record N.J.S.A. 2C:28-7a(2); and
4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury



to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT THREE

(Conspiracy - Second Degree)

RAYMOND A. SOBERS

and

WALDEMAR KOS

who are named as defendants herein, and Wesley Starr, who is a coconspirator but who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 15, 2007, and on or about November 14, 2007, 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 official misconduct, bribery, tampering with public records or information and forgery, did agree together that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or
- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
  - 1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or

would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;

2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and
3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record N.J.S.A. 2C:28-7a(2); and
4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury

to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT FOUR

(Official Misconduct - Second Degree)

RAYMOND A. SOBERS

and

HONGJAN YUAN

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12, 2007, and on or about June 29, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that Wesley Starr, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and Wesley Starr, then and there being a public servant, to wit: Support Service Representative (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from the said RAYMOND A. SOBERS and HONGJAN YUAN for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to RAYMOND A. SOBERS and/or HONGJAN YUAN in the names of two individuals and a business, whose identities are known to the Grand Jurors, and RAYMOND A. SOBERS and/or HONGJAN YUAN did receive monies in excess of \$200 for these titles, 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 FIVE

(Official Misconduct - Second Degree)

RAYMOND A. SOBERS

and

DAMON STINSON, JR.

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about April 24, 1007, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that Wesley Starr, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and Wesley Starr, then and there being a public servant, to wit: Support Service Representative (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from the said RAYMOND A. SOBERS and/or DAMON STINSON, JR. for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to RAYMOND A. SOBERS and DAMON STINSON, JR. in the names of two individuals, whose identities are known to the Grand Jurors, and the said RAYMOND A. SOBERS and/or DAMON STINSON, JR., did receive monies in excess of \$200 for these titles, 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 SIX

(Official Misconduct - Second Degree)

RAYMOND A. SOBERS

and

WALDEMAR KOS

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 15, 2007, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that Wesley Starr, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and Wesley Starr, then and there being a public servant, to wit: Support Service Representative (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from the said RAYMOND A. SOBERS and/or WALDEMAR KOS for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to RAYMOND A. SOBERS and/or WALDEMAR KOS in the names of an individual and/or a business, whose identities are known to the Grand Jurors, and the said RAYMOND A. SOBERS and/or WALDEMAR KOS, did receive monies in excess of \$200 for these titles 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 SEVEN

(Bribery - Second Degree)

RAYMOND A. SOBERS

and

HONGJAN YUAN

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12, 2007, and on or about June 29, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said Wesley Starr, while employed as a Support Service Representative (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Special Titles Unit, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said RAYMOND A. SOBERS and/or HONGJAN YUAN, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to the said RAYMOND A. SOBERS and HONGJAN YUAN in the names of two individuals and a business, whose identities are known to the Grand Jurors, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A.

2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT EIGHT

(Bribery - Second Degree)

RAYMOND A. SOBERS

and

DAMON STINSON, JR.

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about April 24, 2007, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said Wesley Starr, while employed as a Support Service Representative (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Special Titles Unit, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said RAYMOND A. SOBERS and/or DAMON STINSON, JR., as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to the said RAYMOND A. SOBERS and DAMON STINSON, JR., in the names of two individuals, whose identities are known to the Grand Jurors, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and

N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT NINE

(Bribery - Second Degree)

RAYMOND A. SOBERS

and

WALDEMAR KOS

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 15, 2007, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said Wesley Starr, while employed as a Support Service Representative (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Special Titles Unit, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said RAYMOND A. SOBERS and/or WALDEMAR KOS, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to the said RAYMOND A. SOBERS and WALDEMAR KOS, in the names an individual and/or a business, whose identities are known to the Grand Jurors, whose identities are known to the Grand Jurors, contrary to the provisions of N.J.S.A.

2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.



COUNT TEN

(Tampering with Public Records or Information - Third Degree)

RAYMOND A. SOBERS

and

HONGJAN YUAN

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12, 2007, and on or about June 29, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said Wesley Starr and RAYMOND A. SOBERS and HONGJAN YUAN with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use a New Jersey Motor Vehicle Commission Application for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, which was submitted to the New Jersey Motor Vehicle Commission

with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Tampering with Public Records or Information - Third Degree)

RAYMOND A. SOBERS

and

DAMON STINSON, JR.

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about April 24, 2007, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said Wesley Starr and RAYMOND A. SOBERS and DAMON STINSON, JR. with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use a New Jersey Motor Vehicle Commission Application for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, which was submitted to the New Jersey Motor Vehicle

Vehicle Commission with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Tampering with Public Records or Information - Third Degree)

RAYMOND A. SOBERS

and

WALDEMAR KOS

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 15, 2007, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said Wesley Starr and RAYMOND A. SOBERS and WALDEMAR KOS with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use a New Jersey Motor Vehicle Commission Application for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from Edison Township Police Department, and who is a fictitious person, which was submitted to the New Jersey Motor Vehicle Commission with the purpose that it be taken as a

genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Forgery-Third Degree)

RAYMOND A. SOBERS

and

HONGJAN YUAN

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12, 2007, and on or about June 29, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said Wesley Starr and RAYMOND A. SOBERS and HONGJAN YUAN, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership to issue a New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from the Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, when, in fact, no law enforcement authorized these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:2-6, against the peace of this State, the government and dignity of same.

COUNT FOURTEEN

(Forgery-Third Degree)

RAYMOND A. SOBERS


and

WALDEMAR KOS

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other coconspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 15, 2007, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said Wesley Starr and RAYMOND A. SOBERS and WALDEMAR KOS, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue or transfer applications for Certification of Ownership to issue a New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from the Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, when, in fact, no law enforcement officer authorized these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:2-6,



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

  
\_\_\_\_\_  
Deborah L. Gramiccioni, Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

Date: 4/22/09

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ568-09-25

Superior Court

Docket Number 09-04-00072-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

RAFAEL R. GOMEZ )

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

COUNT ONE

(Conspiracy - Second Degree)

RAFAEL R. GOMEZ

who is named as defendant herein, and Wesley Starr, who is a coconspirator but who is not named as a defendant herein, between on or about August 6, 2007, and on or about October 12, 2007, 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 official misconduct, bribery, tampering with public records or information and forgery, did agree together that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or

- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;
  2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and
  3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would make, present, offer for filing or use any record, document or thing knowing it to be

false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record N.J.S.A. 2C:28-7a(2); and

4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

RAFAEL R. GOMEZ

who is named as defendant herein, and Wesley Starr, who is not named as defendant herein, between on or about August 6, 2007, and on or about October 12, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that Wesley Starr, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and Wesley Starr, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept a bribe in excess of \$200 from the said

RAFAEL R. GOMEZ for the improper issuance of a New Jersey Motor Vehicle Commission Motor Vehicle Title to RAFAEL R. GOMEZ in RAFAEL R. GOMEZ'S own name, 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 THREE

(Bribery - Second Degree)

RAFAEL R. GOMEZ

who is named as defendant herein, and Wesley Starr, who is not named as defendant herein, between on or about August 6, 2007, and on or about October 12, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said Wesley Starr, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept money in excess of \$200 offered or conferred either directly or indirectly from the said RAFAEL R. GOMEZ, as consideration for the improper issuance of a New Jersey Motor Vehicle Commission Motor Vehicle Title to the said RAFAEL R. GOMEZ in RAFAEL R. GOMEZ'S own name, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

RAFAEL R. GOMEZ

who is named as defendant herein, and Wesley Starr, who is not named as a defendant herein, between on or about August 6, 2007, and on or about October 12, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said Wesley Starr and RAFAEL R. GOMEZ with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use a New Jersey Motor Vehicle Commission Application for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors and who is a fictitious person, which was submitted to the New Jersey Motor Vehicle Commission with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission,



contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

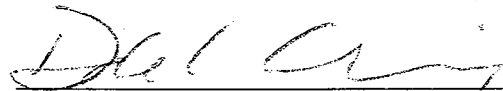
COUNT FIVE

(Forgery-Third Degree)

RAFAEL R. GOMEZ

who is named as defendant herein, and Wesley Starr, who is not named as defendant herein, between on or about August 6, 2007, and on or about October 12, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did utter a writing of another which he knew to be forged, that is, the said Wesley Starr and RAFAEL R. GOMEZ, with purpose to defraud the New Jersey Motor Vehicle Commission, did present an application for Certification of Ownership to issue a New Jersey Motor Vehicle Title purporting to be signed by law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, , when, in fact, no law enforcement officer authorized these acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A.

2C:2-6, against the peace of this State, the government and dignity of same.



Deborah L. Gramiccioni, Director  
Division of Criminal Justice

A TRUE BILL:

  
Theresa Solomon  
Foreperson

Date: 4/22/09

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ568-09-25  
Superior Court  
Docket Number 09-04-00072-S

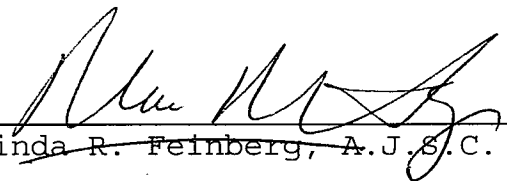
STATE OF NEW JERSEY )  
  
v. )  
  
RAFAEL R. GOMEZ )

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 *5th* day of *April*, 2009, 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.

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

**Maria Marinari Sypek, P.J.Cr.**

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ568-09-31

Superior Court

Docket Number 09-04-00077-S

STATE OF NEW JERSEY )  
v. ) INDICTMENT  
JOHN DELCORPO )  
and )  
THOMAS SONNENBERG )

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

COUNT ONE

(Conspiracy - Second Degree)

JOHN DELCORPO

and

THOMAS SONNENBERG

who are named as defendants herein, and Wesley Starr, who is a co-conspirator but who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12, 2007, and on or about June 21, 2007, 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 official misconduct, bribery, tampering with public

records or information and forgery, did agree together that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or
- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
  - 1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;
  - 2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and

3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record N.J.S.A. 2C:28-7a(2); and
4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

JOHN DELCORPO

and

THOMAS SONNENBERG

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12, 2007, and on or about June 21, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that Wesley Starr, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and Wesley Starr, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from the said JOHN DELCORPO and/or THOMAS SONNENBERG for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to JOHN DELCORPO and THOMAS SONNENBERG in the names of an individual whose identity is known to the Grand Jurors and to Motorcycle Madness, 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 THREE

(Bribery - Second Degree)

JOHN DELCORPO

and

THOMAS SONNENBERG

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12, 2007, and on or about June 21, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said Wesley Starr, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Special Titles Unit, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said JOHN DELCORPO and THOMAS SONNENBERG, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to the said JOHN DELCORPO for JOHN DELCORPO and/or THOMAS SONNENBERG in the names of an individual, whose identity is known to the Grand Jurors and to Motorcycle Madness, contrary to the provisions of N.J.S.A. 2C:27-2c,

N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

JOHN DELCORPO

and

THOMAS SONNENBERG

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12, 2007, and on or about June 21, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said Wesley Starr and JOHN DELCORPO and THOMAS SONNENBERG with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use a New Jersey Motor Vehicle Commission Application for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, which was submitted to the New Jersey Motor Vehicle Commission

with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Forgery-Third Degree)

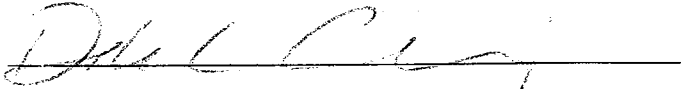
JOHN DELCORPO

and

THOMAS SONNENBERG

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 12, 2007, and on or about June 21, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said Wesley Starr and JOHN DELCORPO and THOMAS SONNENBERG, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership to issue a New Jersey Motor Vehicle Title purporting to be signed by a law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, when, in fact, a law enforcement officer did not authorize these acts, contrary to the provisions of N.J.S.A. 2C:21-1a and N.J.S.A. 2C:2-6,

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



Deborah L. Gramiccioni, Director  
Division of Criminal Justice

A TRUE BILL:

  
Foreperson

Date: 7.22.09

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL


State Grand Jury  
Number SGJ568-09-31  
Superior Court  
Docket Number 09-04-00077-S

STATE OF NEW JERSEY            )  
  v.                                    )  
  ORDER OF VENUE  
JOHN DELCORPO                    )  
  and                                    )  
THOMAS SONNENBERG            )

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

IT IS ORDERED on this *Sund* day of *April*, 2009, 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.

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

**Maria Marinari Sypek, P.J.Cr.**



**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ568-09-29

Superior Court

Docket Number 09-04-00079-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

JOHN MCELROY )

and )

MARYLEIGH BARBUSIN )

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

COUNT ONE

(Conspiracy - Second Degree)

JOHN MCELROY

and

MARYLEIGH BARBUSIN

who are named as defendants herein, and Wesley Starr, who is a co-conspirator but who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 11, 2007, and on or about August 16, 2007, 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 official misconduct, bribery, tampering with public

records or information and forgery, did agree together that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or
- B. One or more of them would aid in the planning, attempt, solicitation, or commission of said crimes, that is:
  - 1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;

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  - 2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and

3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record N.J.S.A. 2C:28-7; and
4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

JOHN MCELROY

and

MARYLEIGH BARBUSIN

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 11, 2007, and on or about August 16, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that Wesley Starr, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and Wesley Starr, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from the said JOHN MCELORY and/or MARYLEIGH BARBUSIN for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to JOHN MCELORY and/or MARYLEIGH BARBUSIN in the names of several individuals and/or businesses, whose identities are known to the Grand Jurors, 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 THREE

(Bribery - Second Degree)

JOHN MCELROY

and

MARYLEIGH BARBUSIN

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 11, 2007, and on or about August 16, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said Wesley Starr, while employed as a Support Service Representative (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Special Titles Unit, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said JOHN MCELROY and MARYLEIGH BARBUSIN, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to the said JOHN MCELROY and MARYLEIGH BARBUSIN in the names of several individuals and/or businesses, whose identities are known to the Grand Jurors, contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and

N.J.S.A. 2C:2-6, and against the peace of the State, the government and the dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

JOHN MCELROY

and

MARYLEIGH BARBUSIN

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 11, 2007, and on or about August 16, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, did make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record; that is, the said Wesley Starr and JOHN MCELROY and MARYLEIGH BARBUSIN with

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the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use a New Jersey Motor Vehicle Commission Application for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors, who is a fictitious person, which was submitted to the New Jersey Motor Vehicle Commission



with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Forgery-Third Degree)

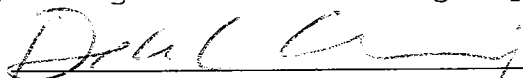
JOHN MCELROY

and

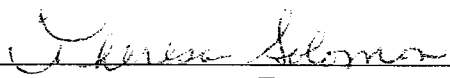
MARYLEIGH BARBUSIN

who are named as defendants herein, and Wesley Starr, who is not named as a defendant herein, and other co-conspirators whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about March 11, 2007, and on or about August 16, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did make, execute, issue, or transfer a writing so that it purported to be the act of another who did not authorize that act or a fictitious person, that is, the said Wesley Starr and JOHN MCELROY and MARYLEIGH BARBUSIN, with purpose to defraud the New Jersey Motor Vehicle Commission, did make, execute, issue, or transfer applications for Certification of Ownership in order to issue New Jersey Motor Vehicle Titles purporting to be signed by a law enforcement officer from Edison Township Police Department, whose identity is known to the Grand Jurors, and who is a fictitious person, when, in fact, no law enforcement officer authorized these acts, contrary to the provisions of N.J.S.A. 2C:21-1a and N.J.S.A. 2C:2-6,

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

  
\_\_\_\_\_  
Deborah L. Gramiccioni, Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

Date: 4/23/09

**FILED**

APR 22 2009

**SUPERIOR COURT  
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ568-09-29  
Superior Court  
Docket Number 09-04-00079-S

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

JOHN MCELROY )

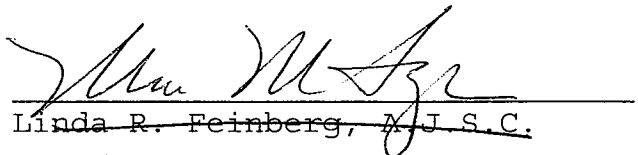
and )

MARYLEIGH BARBUSIN )

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

IT IS ORDERED on this *22nd* day of *April*, 2009, 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.

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

**Maria Marinari Sypek, P.J.Ch.**