

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-4

Superior Court 11 - 11 - 00154 - S

Docket Number _____

STATE OF NEW JERSEY)

v.)

INDICTMENT

FILED

SONIA NOEL)

DEC 05 2011

MELODY NOEL)

State Grand Jury Judge

PETER LOVERAS)

and)

HERNAN CHICA)

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

COUNT ONE

(Conspiracy - Second Degree)

SONIA NOEL

MELODY NOEL

PETER LOVERAS

and

HERNAN CHICA

who are named as defendants herein, and other persons whose
identities are both known and unknown to the Grand Jurors, who
are named as co-conspirators but not as defendants herein,
between on or about June 30, 2008, and on or about September 26,
2008, at the Township of North Bergen, the City of Union City,

and the City of Jersey City, all in the County of Hudson, elsewhere, and within the jurisdiction of the Court, with the purpose of promoting and facilitating the commission of the crimes of official misconduct, bribery, computer theft, and tampering with public records or information, did agree together and with a member of the New Jersey Division of Criminal Justice working in an undercover capacity and a person whose identity is known to the Grand Jurors and who at all times relevant to this Indictment was acting as an agent of the New Jersey Division of Criminal Justice, that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes; or

B. One or more of them knowingly would aid in the planning, attempt, solicitation or commission of the said crimes, that is:

1. Knowingly commit an act relating to the office of a public servant but constituting an unauthorized exercise of said public servant's official functions, knowing that such act was unauthorized or was being committed in an unauthorized manner, or knowingly refrain from performing a duty which is imposed upon said public servant by law or which is clearly inherent in the nature of the public office, with purpose to obtain a benefit for the public servant or another, contrary to the provisions of N.J.S.A. 2C:30-2.

2. Knowingly directly or indirectly offer, confer or agree to confer upon another, or solicit, accept or agree to accept from another, a benefit as consideration for a violation of an official duty of a public servant, contrary to the provisions of N.J.S.A. 2C:27-2.

3. Purposely or knowingly, without authorization or in excess of authorization, to alter the New Jersey Motor Vehicle Commission data base or other computer storage medium, contrary to the provisions of N.J.S.A. 2C:20-25.

4. With purpose to defraud the New Jersey Motor Vehicle Commission, to 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 any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, contrary to the provisions of N.J.S.A. 2C:28-7a(2).

The Grand Jurors aforesaid, upon their oaths, do further present that:

It was part of the said conspiracy that SONIA NOEL, a Customer Service Representative for the New Jersey Motor Vehicle Commission, did accept money in exchange for the improper issuance of New Jersey Motor Vehicle Commission driver's licenses.

It was part of the said conspiracy that MELODY NOEL, also a Customer Service Representative for the New Jersey Motor Vehicle Commission, did assist SONIA NOEL in the improper issuance of a New Jersey Motor Vehicle Commission driver's license.

It was part of the said conspiracy that PETER LOVERAS did act as a broker to assist individuals who could not legitimately obtain New Jersey Motor Vehicle Commission driver's licenses, accept money from these individuals, and arrange for these individuals to obtain New Jersey Motor Vehicle Commission driver's licenses from SONIA NOEL.

It was part of the said conspiracy that HERNAN CHICA, and a member of the New Jersey Division of Criminal Justice working in an undercover capacity, did give money to PETER LOVERAS and SONIA NOEL in exchange for the improper issuance of a New Jersey Motor Vehicle Commission driver's license.

It was part of the said conspiracy that a person whose identity is known to the Grand Jurors and who at all times relevant to this Indictment was acting as an agent of the New Jersey Division of Criminal Justice, did give money to PETER LOVERAS and SONIA NOEL in order to obtain a New Jersey Motor Vehicle Commission driver's license.

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

COUNT TWO

(Pattern of Official Misconduct - Second Degree)

SONIA NOEL

between on or about June 30, 2008, and on or about September 26, 2008, at the Township of North Bergen, the City of Union City, and the City of Jersey City, all in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the offense of Pattern of Official Misconduct in that she did commit two or more acts of Official Misconduct, each in violation of N.J.S.A. 2C:30-2, that is, the said SONIA NOEL, then and there being a public servant, to wit: a Customer Service Representative with the New Jersey Motor Vehicle Commission, Jersey City Agency, having thereby the official functions and duties, among others, to verify that individuals applying for New Jersey driver's licenses display the required six-points of identification and are thereby authorized to receive said licenses, to process and issue New Jersey Motor Vehicle Commission Digital driver's licenses, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did commit two or more acts of Official Misconduct, at least one of which was a crime of the second degree, including but not limited to those acts described in Counts Three through Five, which allegations are incorporated by reference as if fully set forth herein, contrary to the

provisions of N.J.S.A. 2C:30-7, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Official Misconduct - Second Degree)

SONIA NOEL

and

PETER LOVERAS

between on or about July 1, 2008, and on or about July 10, 2008, at the Township of North Bergen, the City of Union City, and City of Jersey City, all in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said SONIA NOEL, being a public servant, that is, a Customer Service Representative for the New Jersey Motor Vehicle Commission, Jersey City Agency, and acting with a purpose to obtain a benefit for herself or another or to injure or to deprive another of a benefit, did commit an act or acts relating to her office, but constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon her by law or clearly inherent in the nature of her office, that is, the said SONIA NOEL, while employed by the New Jersey Motor Vehicle Commission, Jersey City Agency, thereby performing a governmental function, having thereby the official functions and duties, among others, to verify that individuals applying for New Jersey driver's licenses display the required six-points of

identification and are thereby authorized to receive said licenses, to process and issue New Jersey Motor Vehicle Commission Digital driver's licenses, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did, with purpose to secure a benefit for herself or another, accept money in excess of \$200 from PETER LOVERAS, and a person whose identity is known to the Grand Jurors, who at all times relevant to the indictment was a member of the New Jersey Division of Criminal Justice working in an undercover capacity, in exchange for the improper issuance of a New Jersey Motor Vehicle Commission driver's license, 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 the same.

COUNT FOUR

(Official Misconduct - Second Degree)

SONIA NOEL

PETER LOVERAS

and

HERNAN CHICA

between on or about July 1, 2008, and on or about August 14, 2008, at the Township of North Bergen, and City of Jersey City, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said SONIA NOEL, being a public servant, that is, a Customer Service Representative for the New Jersey Motor Vehicle Commission, Jersey City Agency, and acting with a purpose to obtain a benefit for herself or another or to injure or to deprive another of a benefit, did commit an act or acts relating to her office, but constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon her by law or clearly inherent in the nature of her office, that is, the said SONIA NOEL, while employed by the New Jersey Motor Vehicle Commission, Jersey City Agency, thereby performing a governmental function, having thereby the official functions and duties, among others, to verify that individuals applying for

New Jersey driver's licenses display the required six-points of identification and are thereby authorized to receive said licenses, to process and issue New Jersey Motor Vehicle Commission Digital driver's licenses, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did, with purpose to secure a benefit for herself or another, accept money in excess of \$200 from PETER LOVERAS and HERNAN CHICA, in exchange for the improper issuance of a New Jersey Motor Vehicle Commission driver's license, 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 the same.

COUNT FIVE

(Official Misconduct - Second Degree)

SONIA NOEL

and

PETER LOVERAS

on or about September 26, 2008, at the Township of North Bergen, the City of Union City, and City of Jersey City, all in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said SONIA NOEL, being a public servant, that is, a Customer Service Representative for the New Jersey Motor Vehicle Commission, Jersey City Agency, and acting with a purpose to obtain a benefit for herself or another or to injure or to deprive another of a benefit, did commit an act or acts relating to her office, but constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon her by law or clearly inherent in the nature of her office, that is, the said SONIA NOEL, while employed by the New Jersey Motor Vehicle Commission, Jersey City Agency, thereby performing a governmental function, having thereby the official functions and duties, among others, to verify that individuals applying for New Jersey driver's licenses display the required six-points of

identification and are thereby authorized to receive said licenses, to process and issue New Jersey Motor Vehicle Commission Digital driver's licenses, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did, with purpose to secure a benefit for herself or another, accept money from PETER LOVERAS and a person whose identity is known to the Grand Jurors and who at all times relevant to this Indictment was acting as an agent of the New Jersey Division of Criminal Justice, in order to obtain a New Jersey Motor Vehicle Commission driver's license, 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 the same.

COUNT SIX

(Official Misconduct - Second Degree)

MELODY NOEL

and

PETER LOVERAS

on or about July 10, 2008, at the Township of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said MELODY NOEL, being a public servant, that is, a Customer Service Representative for the New Jersey Motor Vehicle Commission, Jersey City Agency, and acting with a purpose to obtain a benefit for herself or another or to injure or to deprive another of a benefit, did commit an act or acts relating to her office, but constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed upon her by law or clearly inherent in the nature of her office, that is, the said MELODY NOEL, while employed by the New Jersey Motor Vehicle Commission, Jersey City Agency, thereby performing a governmental function, having thereby the official functions and duties, among others, to verify that individuals applying for New Jersey driver's licenses display the required six-points of identification and are thereby authorized to receive said

licenses, to process and issue New Jersey Motor Vehicle Commission Digital driver's licenses, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did, with purpose to secure a benefit for herself or another, did assist PETER LOVERAS in obtaining a New Jersey Motor Vehicle Commission Digital driver's license for a person whose identity is known to the Grand Jurors, who at all times relevant to the indictment was a member of the New Jersey Division of Criminal Justice working in an undercover capacity, 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 the same.

COUNT SEVEN

(Bribery - Second Degree)

SONIA NOEL

and

PETER LOVERAS

between on or about July 1, 2008, and on or about July 10, 2008, at the Township of North Bergen, the City of Union City, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer or agree to confer upon another, or solicited, accepted or agreed to accept from another, a benefit in excess of \$200.00, as consideration for the violation of an official duty of a public servant, that is, said SONIA NOEL, then and there being a Customer Service Representative for the New Jersey Motor Vehicle Commission, Jersey City Agency, accepted money in excess of \$200 from PETER LOVERAS, and a person whose identity is known to the Grand Jurors, who at all times relevant to the indictment was a member of the New Jersey Division of Criminal Justice working in an undercover capacity, in exchange for the improper issuance of a New Jersey Motor Vehicle Commission driver's license, contrary to the provisions of N.J.S.A. 2C:27-2c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Bribery - Second Degree)

SONIA NOEL

PETER LOVERAS

and

HERNAN CHICA

between on or about July 1, 2008, and on or about August 14, 2008, at the Township of North Bergen, the City of Union City, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer or agree to confer upon another, or solicited, accepted or agreed to accept from another, a benefit in excess of \$200.00, as consideration for the violation of an official duty of a public servant, that is, said SONIA NOEL, then and there being a Customer Service Representative for the New Jersey Motor Vehicle Commission, Jersey City Agency, accepted money in excess of \$200 from PETER LOVERAS and HERNAN CHICA, in exchange for the improper issuance of a New Jersey Motor Vehicle Commission driver's license, contrary to the provisions of N.J.S.A. 2C:27-2c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Bribery - Second Degree)

SONIA NOEL

and

PETER LOVERAS

on or about September 26, 2008, at the Township of North Bergen, the City of Union City, both in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer or agree to confer upon another, or solicited, accepted or agreed to accept from another, a benefit in excess of \$200.00, as consideration for the violation of an official duty of a public servant, that is, said SONIA NOEL, then and there being a Customer Service Representative for the New Jersey Motor Vehicle Commission, Jersey City Agency, accepted money in excess of \$200 from PETER LOVERAS, and a person whose identity is known to the Grand Jurors and who at all times relevant to this Indictment was acting as an agent of the New Jersey Division of Criminal Justice, in order to obtain a New Jersey Motor Vehicle Commission driver's license, contrary to the provisions of N.J.S.A. 2C:27-2c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNTS TEN AND ELEVEN

(Computer Theft - Second Degree)

SONIA NOEL

MELODY NOEL

PETER LOVERAS

and

HERNAN CHICA

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, purposely or knowingly and without authorization, or in excess of authorization, did alter the Motor Vehicle Commission data base or other computer storage medium, that is, said SONIA NOEL, then and there being a Customer Service Representative for the New Jersey Motor Vehicle Commission, Jersey City Agency, with the assistance of MELODY NOEL and HERNAN CHICA, altered the New Jersey Motor Vehicle Commission Database or other computer storage medium by entering false data that New Jersey Motor Vehicle Commission driver's licenses were properly issued to HERNAN CHICA, and a person whose identity is known to the Grand Jurors, who at all times relevant to the indictment was a member of the New Jersey Division of Criminal Justice working in an undercover capacity, all as set forth herein:

Count	Defendant(s)	Date(s)	Municipality/ County
10	SONIA NOEL, MELODY NOEL and PETER LOVERAS	7/10/2008	City of Jersey City, County of Hudson
11	SONIA NOEL, PETER LOVERAS and HERNAN CHICA	8/14/2008	City of Jersey City, County of Hudson

contrary to the provisions of N.J.S.A. 2C:20-25b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNTS TWELVE AND THIRTEEN

(Tampering With Public Records or Information - Third Degree)

SONIA NOEL

MELODY NOEL

PETER LOVERAS

and

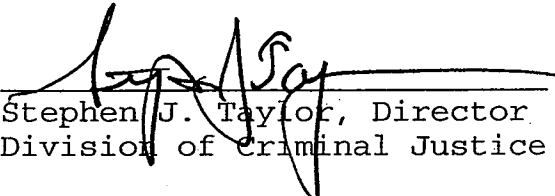
HERNAN CHICA

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, with purpose to defraud the New Jersey Motor Vehicle Commission, knowingly did make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, or made, presented, offered for filing, or used any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of said information or records, that is, New Jersey Motor Vehicle Commission applications for New Jersey driver's licenses containing false information, all as set forth herein:

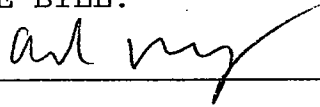
Count	Defendant(s)	Date(s)	Municipality/ County
12	SONIA NOEL, MELODY NOEL and PETER LOVERAS	7/10/2008	City of Jersey City, County of Hudson

Count	Defendant(s)	Date(s)	Municipality/ County
13	SONIA NOEL, PETER LOVERAS and HERNAN CHICA	8/14/2008	City of Jersey City, County of Hudson

contrary to the provisions of N.J.S.A. 2C:28-7a(1), 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.


 Stephen J. Taylor, Director
 Division of Criminal Justice

TRUE BILL:



 Foreperson

Date: 11/17/11

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-4

Superior Court

Docket Number

11 - 11 - 00154 - S

FILED

DEC 05 2011

State Grand Jury Judge

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

SONIA NOEL)

MELODY NOEL)

PETER LOVERAS)

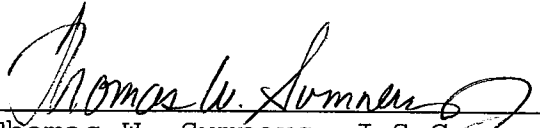
and)

HERNAN CHICA)

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

IT IS ORDERED on this 17th day of November, 2011,
pursuant to paragraph 8 of the State Grand Jury Act, that the
County of Hudson 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 Hudson for filing.


Thomas W. Summers, J.S.C.

FILED

DEC 05 2011

State Grand Jury Judge

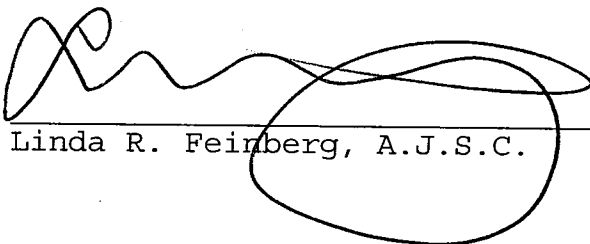
SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

IN THE MATTER OF)
STATE GRAND JURY INDICTMENT)
NUMBER SGJ614-11-4)
STATE OF NEW JERSEY)
v.)
SONIA NOEL)
MELODY NOEL)
PETER LOVERAS)
and)
HERNAN CHICA)

ORDER TO UNSEAL INDICTMENT

Andrew M. Butchko, Deputy Attorney General of the State of New Jersey, having on this date made written and oral application for an order to unseal State Grand Jury Indictment Number SGJ614-11-4, and to unseal the Order of Venue designating a county of venue for the purpose of trial of the said Indictment;

IT IS HEREBY ORDERED on this 5th day of December 2011, that the Clerk of the Superior Court unseal and release State Grand Jury Indictment Number SGJ614-11-4 and the Order of Venue designating a county of venue for the purpose of the trial of the said Indictment.


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

FILED

DEC 05 2011

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

IN THE MATTER OF **State Grand Jury Judge**

STATE GRAND JURY INDICTMENT)

VERIFIED PETITION

NUMBER SGJ614-11-4)

STATE OF NEW JERSEY)

SS.

COUNTY OF MERCER)

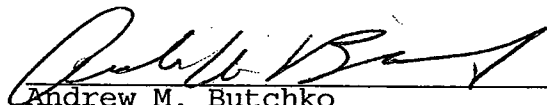
Andrew M. Butchko, of full age, being duly sworn according to law, upon his oath, respectfully petitions the Court as follows:

1. I am a Deputy Attorney General assigned to the Division of Criminal Justice.

2. On November 17, 2011, an Indictment in the above-captioned matter was returned to this Court. On that date the said Indictment and Order of Venue designating a county of venue for the purpose of trial were sealed by Order of this Court dated November 17, 2011.


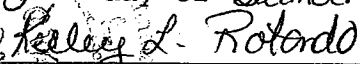
3. The investigative reasons which supported the sealing of the Indictment and order described in paragraph 2, pursuant to R.3:6-8, no longer prevail.

4. Therefore, I respectfully petition this Court to order the above-captioned Indictment and Order of Venue be unsealed and released as public documents.



Andrew M. Butchko
Deputy Attorney General
Division of Criminal Justice

Sworn and subscribed to before me
this 5th day of December, 2011.

Kelley L. Rotondo, Notary Public NJ
My commission expires May 11, 2012
(ID #2200797)