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Linda R. Feinberg, A/C

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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

DEC 05 2011

State Grand Jury Judge

State Grand Jury

Number SGJ614-11-6

Superior Court

Docket Number 11-11-00138-S

STATE OF NEW JERSEY)

v.)

CRISTIAN J. TOLEDO)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

CRISTIAN J. TOLEDO

who is named as a defendant herein, and another person whose
identity is known to the Grand Jurors, who is named as a co-
conspirator but not as a defendant herein, between on or about
May 1, 2008, and on or about June 23, 2008, at the Township of
North Bergen, in the County of Hudson, elsewhere, and within the
jurisdiction of this 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 person whose identity
is known to the Grand Jurors who at 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 to 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 to 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 to directly or indirectly offer, confer or agree to confer upon another, or to 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 CRISTIAN J. TOLEDO, 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 a person whose identity is known to the Grand Jurors, who is named as co-conspirator but not as defendant herein, did recruit an individual who could not legitimately obtain a New Jersey Motor Vehicle Commission driver's license, accept money from that individual, and arrange for the individual to obtain a New Jersey Motor Vehicle Commission driver's license from CRISTIAN J. TOLEDO.

It was part of the said conspiracy that a person whose identity is known to the Grand Jurors who at times relevant to this indictment was acting as an agent of the New Jersey Division of Criminal Justice did give money to CRISTIAN J. TOLEDO in exchange for the improper issuance of 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

(Official Misconduct - Second Degree)

CRISTIAN J. TOLEDO

between on or about May 1, 2008, and on or about June 23, 2008, at the Township of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another, did commit an act or acts relating to his duties as a Customer Service Representative for the New Jersey Motor Vehicle Commission, North Bergen Agency, but constituting an unauthorized exercise of his official functions, knowing that such acts were unauthorized, that is, the said CRISTIAN TOLEDO, while employed by the New Jersey Motor Vehicle Commission, North Bergen 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 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 money 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 against the peace of this State, the government and dignity of the same.

COUNT THREE

(Bribery - Second Degree)

CRISTIAN J. TOLEDO

between on or about May 1, 2008, and on or about June 23, 2008, at the Township of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly did solicit, accept or agree to accept from another, a benefit in excess of \$200, as consideration for the violation of an official duty of a public servant, that is, the said CRISTIAN J. TOLEDO, then and there being a Customer Service Representative for the New Jersey Motor Vehicle Commission, North Bergen Agency, accepted money in excess of \$200 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 FOUR

(Computer Theft - Second Degree)

CRISTIAN J. TOLEDO

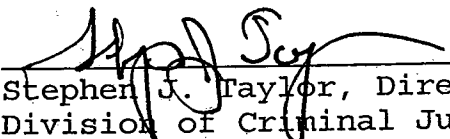
on or about May 31, 2008, at the Township of North Bergen, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, purposely or knowingly and without authorization, or in excess of authorization, did alter the Motor Vehicle Commission data base or other computer storage medium, that is, the said CRISTIAN J. TOLEDO, then and there being a Customer Service Representative for the New Jersey Motor Vehicle Commission, North Bergen Agency, altered the New Jersey Motor Vehicle Commission database or other computer storage medium by entering false data that a New Jersey Driver's license was properly issued to a person whose identity is known to the Grand Jurors who at times relevant to this indictment was acting as an agent of the New Jersey Division of Criminal Justice, contrary to the provisions of N.J.S.A. 2C:20-25b, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

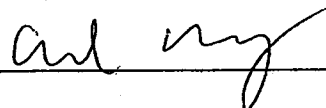
(Tampering With Public Records or Information - Third Degree)

CRISTIAN J. TOLEDO

on or about May 31, 2008, at the Township of North Bergen, in the County of Hudson, 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, a New Jersey Motor Vehicle Commission application for a New Jersey driver's license containing false information, contrary to the provisions of N.J.S.A. 2C:28-7a(1), N.J.S.A. 2C:28-7a(2), 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: 11/3/11

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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

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State Grand Jury Judge

State Grand Jury

Number SGJ614-11-6

Superior Court

Docket Number 11-11-00138-S

STATE OF NEW JERSEY)

v.)

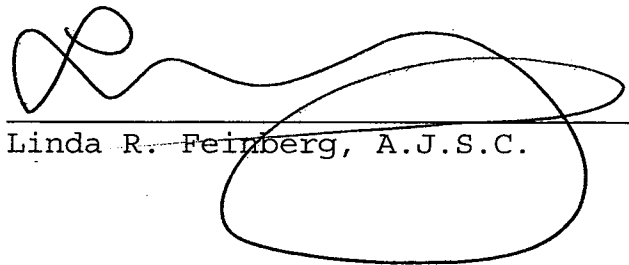
ORDER OF VENUE

CRISTIAN TOLEDO)

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

IT IS ORDERED on this 3rd 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.



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

DEC 05 2011

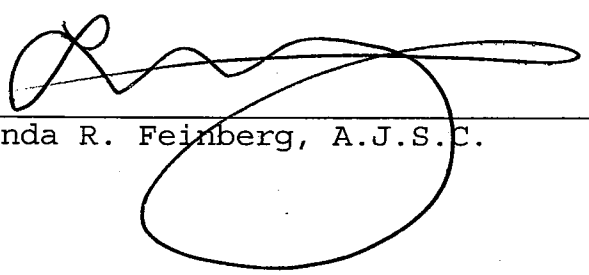
State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

IN THE MATTER OF)
STATE GRAND JURY INDICTMENT) ORDER TO UNSEAL INDICTMENT
NUMBER SGJ614-11-6)
STATE OF NEW JERSEY)
v.)
CRISTIAN TOLEDO)

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 SGJ614-11-6, 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 SGJ614-11-6 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.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

IN THE MATTER OF)
STATE GRAND JURY INDICTMENT)
NUMBER SGJ614-11-6)

VERIFIED PETITION

FILED

DEC 05 2011

STATE OF NEW JERSEY)
COUNTY OF MERCER) SS.

State Grand Jury Judge


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 3, 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 3, 2011.

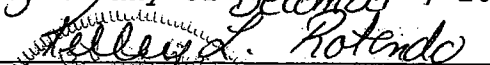
3. The investigative reasons which supported the sealing of the Indictment and order described in paragraph 2, pursuant to R.3:6-8, no longer prevail.

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 #2700797)

