

1. Official Misconduct, in that one or more of them, being a public servant, would, with the purpose to obtain a benefit for herself or another in excess of \$200, knowingly commit an act relating to her office but constituting an unauthorized exercise of her official functions, knowing that such act was unauthorized or was being committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a and N.J.S.A. 2C:2-6;

2. Computer Theft, in that one or more of them would purposely or knowingly and without authorization, or in excess of authorization, would accesses or attempt to access any data, data base, computer, computer storage medium, computer program, computer software, computer equipment, computer system or computer network for the purpose of executing a scheme to defraud, or to obtain services, property, personal identifying information, or money, in excess of \$5,000, from the owner of a computer or any third, contrary to the provisions of N.J.S.A. 2C:20-25c and N.J.S.A. 2C:2-6;

3. Theft by deception, in that one or more of them would purposely obtain property of another, having a value greater than \$75,000, by deception, in violation of N.J.S.A. 2C:20-4;

4. Tampering With Public Records or Information, in that one or more of them would, with the purpose to defraud or injure another, did knowingly make, present, offer for filing or use any record, document, or thing, knowing such record, document, or thing to be false or to contain false information, with the purpose that the record, document, or thing be taken as a genuine part of information

or records belonging to, or received or kept by, the government for information or record, in violation of N.J.S.A. 2C:27-8a(2); and

5. Motor Vehicle Title Offenses, in that one or more of them would knowingly or purposely forge, change, or counterfeit a part of title papers, in violation of N.J.S.A. 2C:21-4.8b(3).

OVERT ACTS

The Grand Jurors aforesaid, upon their oaths, do further present that in the pursuance of the said conspiracy, the following OVERT ACT, among others, were committed:

ANTHONY FERRER did submit falsified motor vehicle title papers and applications to the New Jersey Motor Vehicle Commission.

All in violation 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)

ANTHONY FERRER

who is named as a defendant herein, and another person whose identity is known to the Grand Jurors, who is a co-conspirators but not named as a defendant herein, between on or about November 23, 2013, and on or about December 24, 2013, at the Borough of Washington, in the County of Warren, elsewhere, and within the jurisdiction of this Court, did commit the offense of Official Misconduct when, one or more of them being a public servant, with the purpose to obtain a benefit for herself or another in excess of \$200, did commit an act relating to their office, but constituting an unauthorized exercise of her official functions, knowing that such act was unauthorized or that such act was committed in an unauthorized manner, or did knowingly refrain from performing a duty which is imposed upon them by law or is clearly inherent in the nature of his office, that is, "Y.C.," then and there being a public servant, to wit, a Customer Service Representative for the New Jersey Department of Transportation - Motor Vehicle Commission, and having therefore certain official functions and duties, including, among others, to process Applications for Certification of Ownership of Motor Vehicles made by the public to the New Jersey Motor Vehicle Commission, to perform said duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious from corrupting influences, did knowingly process fraudulent Applications for Certificates of Ownership of Motor Vehicles, along with supporting and accompanying documents, with the

purpose to secure a benefit for herself or another, in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2a, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Computer Theft - Second Degree)

ANTHONY FERRER

who is named as a defendant herein, and another person whose identity is known to the Grand Jurors, who is a co-conspirator but not named as a defendant herein, between, on or about November 23, 2013, and December 24, 2013, at the Borough of Washington, in the County of Warren, elsewhere, and within the jurisdiction of this Court, did purposely or knowingly and without authorization, or in excess of authorization, access or attempt to access any data, data base, computer, computer storage medium, computer program, computer software, computer equipment, computer system or computer network for the purpose of executing a scheme to defraud, or to obtain services, property, personal identifying information, or money, in excess of \$5,000, from the owner of a computer or any third party, to wit, at ANTHONY FERRER'S request, "Y.C." did process an Application for Certificate of Ownership documents electronically by accessing data within the New Jersey Motor Vehicle Commission data base without authorization, or in excess of authorization, and the said New Jersey Motor Vehicle Commission being a government agency, contrary to the provisions of N.J.S.A. 2C:20-25c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Theft by Deception - Second Degree)

ANTHONY FERRER

at the times and places set forth in the table below, elsewhere, and within the jurisdiction of the Court, did obtain the property of certain institutions, entities, or companies, as set forth below, having a value of over \$75,000, by deception, that is, ANTHONY FERRER did create or reinforce the false impression that certain motor vehicles were free and clear of any liens and therefore able to be transferred or sold without payment to the lien holders, as set forth below:

Date	Victim	Vehicle	Lien Amount	Location
10/9/12	AmeriCredit Financial	2012 Chevrolet Camaro, VIN/2G1FA1E31C9134681	\$27,836.78	Borough of Somerville, in the County of Somerset
1/25/13	Ally Financial	2012 Chevrolet Malibu, VIN/1G1ZA5EU7CF398458	\$27,382.37	Borough of Washington, County of Warren
2/13/13	Santander Consumer USA, Inc.	2012 Chevrolet Malibu, VIN/1G1A5EU5CF398197	\$27,802.24	Borough of Washington, County of Warren

Date	Victim	Vehicle	Interest Amount	Location
8/29/13	Potenza LLC	2011 BMW X6, VIN/5UXFG8C54BLZ96771	\$62,950.80	City of Bayonne, in the County of Hudson
8/31/13	Hudson Valley Federal Credit Union	2009 Nissan Murano, VIN/JN8AZ18W29W111799	\$27,614.01	City of Bayonne, in the County of Hudson
11/23/13	Ally Financial	2012 Chrysler 300, VIN/2C3CCABG7CH207851	\$33,469.15	Borough of Washington, County of Warren
12/24/13	Ally Financial	2014 Jeep Cherokee, VIN/1C4PJMC6EW107820	\$32,765.51	Borough of Washington, County of Warren

WHEREAS, the said ANTHONY FERRER well knew the vehicles were not free of liens and were in fact unable to sold to other persons without satisfying the liens, contrary to N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Bribery - Second Degree)

ANTHONY FERRER

between on or about November 23, 2013, and on or about December 24, 2013, at the Borough of Washington, in the County of Warren, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon "Y.C.," a Customer Service Representative employed by the New Jersey Motor Vehicle Commission, a benefit in excess of \$200 as consideration for the violation of her official duties, or the performance of her official duties, specifically, the processing of fraudulent automobile title paperwork, contrary to the provisions of N.J.S.A. 2C:27-2(c) and (d), and against the peace of this State, the government and dignity of the same.

COUNTS SIX THROUGH EIGHT

(Use of Personal Identifying Information of Another - Second Degree)

ANTHONY FERRER

at the times and places set forth in the table below, elsewhere, and within the jurisdiction of the Court, did knowingly, exhibit, display or utter a document or other writing which belongs or pertains to a person other than the person who possessed the document in obtaining documents issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, as set forth herein:

Count	Date	Alias	Document(s) in Support of Application	Documents Obtained	Locations
6	12/4/12	"G.W."	Social Security card	New Jersey Non-Driver's Identification Card	City of East Orange, County of Essex
7	12/10/12	"G.W."	New Jersey Non-Driver's Identification Card, birth certificate, and Social Security card	New Jersey Class D Driver's Examination Permit	Borough of Washington, County of Warren
8	3/23/13	"P.H."	Birth certificate and Social Security card	New Jersey Class D Driver's Examination Permit; New Jersey Class E Driver's Examination Permit; New Jersey Class D Digital Driver's License	Borough of Washington, County of Warren

contrary to the provisions of N.J.S.A. 2C:21-17.2, and against the peace of this State, the government and dignity of the same.

COUNTS NINE THROUGH SEVENTEEN

(Motor Vehicle Title Offenses - Third Degree)

ANTHONY FERRER

at the times and places set forth in the table below, elsewhere, and within the jurisdiction of the Court, did knowingly or purposely make a misrepresentation or false statement in title papers or other papers submitted to the Chief Administrator of the New Jersey Motor Vehicle Commission in connection therewith, or forge, change, or counterfeit a part of title papers, as set forth herein:

Count	Date	Vehicle	Locations
9	8/4/11	2011 Jeep Patriot, VIN/1J4NF1GB7BD100460	Borough of Somerville, in the County of Somerset
10	10/9/12	2012 Chevrolet Camaro, VIN/2G1FA1E31C9134681	Borough of Washington, County of Warren
11	1/25/13	2012 Chevrolet Malibu, VIN/1G1ZA5EU7CF398458	Borough of Washington, County of Warren
12	2/13/13	2012 Chevrolet Malibu, VIN/1G1A5EU5CF398197	Borough of Washington, County of Warren
13	8/29/13	2011 BMW X6, VIN/5UXFG8C54BLZ96771	City of Bayonne, in the County of Hudson
14	8/31/13	2009 Nissan Murano, VIN/JN8AZ18W29W111799	City of Bayonne, in the County of Hudson
15	9/11/13	2011 BMW Motorcycle, VIN/WB1051706BZV43085	City of Trenton, County of Mercer
16	11/23/13	2012 Chrysler 300, VIN/2C3CCABG7CH207851	Borough of Washington, County of Warren
17	12/24/13	2014 Jeep Cherokee, VIN/1C4PJMC6EW107820	Borough of Washington, County of Warren

contrary to the provisions of N.J.S.A. 2C:21-4.8b(1), N.J.S.A. 2C:21-4.8b(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN THROUGH TWENTY-EIGHT

(Tampering with Public Records or Information - Third Degree)

ANTHONY FERRER

at the times and places set forth in the table below, elsewhere, and within the jurisdiction of the Court, with the purpose to defraud or injure the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing or use any record, document, or thing, knowing each it to be false or to contain false information, 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, as set forth herein:

Count	Date	False Record, Document, or Thing	False Applicant Name	Location
18	12/4/12	Application for New Jersey Non-Driver's Identification Card	"G.W."	City of East Orange, County of Essex
19	12/10/12	Application for New Jersey Class D Driver's Examination Permit	"G.W."	Borough of Washington, County of Warren
20	3/23/13	Application for New Jersey Class D Driver's Examination Permit	"P.H."	Borough of Washington, County of Warren
21	3/23/13	Application for New Jersey Class D Driver's Examination Permit	"P.H."	Borough of Washington, County of Warren

Count	Date	False Record, Document, or Thing	False Applicant Name	Location
22	3/23/13	Application for New Jersey Class D Digital Driver's License	"P.H."	Borough of Washington, County of Warren
23	10/9/12	Application for New Jersey Certificate of Title for a 2012 Chevrolet Camaro, VIN/2G1FA1E31C9134681	"P.H."	Borough of Washington, County of Warren
24	10/9/12	Application for New Jersey Vehicle Registration for a 2012 Chevrolet Camaro, VIN/2G1FA1E31C9134681	"P.H."	Borough of Washington, County of Warren
25	8/29/13	Application for Certificate of Title for a 2011 BMW X6, VIN/5UXFG8C54BLZ96771	"P.H."	City of Bayonne, in the County of Hudson
26	11/23/13	Application for New Jersey Certificate of Title for a 2012 Chrysler 300, VIN/2C3CCABG7CH207851	"P.H."	Borough of Washington, County of Warren
27	12/24/13	Application for New Jersey Certificate of Title for a 2014 Jeep Cherokee, VIN/1C4PJMC6EW107820	"P.H."	Borough of Washington, County of Warren

Count	Date	False Record, Document, or Thing	False Applicant Name	Location
28	12/24/13	Application for New Jersey Registration for a 2014 Jeep Cherokee, VIN/1C4PJMC6EW107820	"P.H."	Borough of Washington, County of Warren

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

COUNT TWENTY-NINE THROUGH THIRTY-TWO

(Tampering with Public Records or Information - Third Degree)

ANTHONY FERRER

at the times and places set forth herein, elsewhere, and within the jurisdiction of the Court, with the purpose to defraud or injure the New Jersey Motor Vehicle Commission, did knowingly make, present, or offer for filing or use any record, document, or thing, or cause another to make, present, or offer for filing or use any record, document, or thing, knowing it to be false or to contain false information, 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, as set forth herein:

Count	Date	False Record, Document, or Thing	Application Submitted By:	Falsity	Location
29	8/4/11	Application for New Jersey Certificate of Title, and Supporting Documents, for a 2011 Jeep Patriot, VIN/1J4NF1GB7BD100460	Foreign Imports, LLC	State of Georgia Certificate of Title indicating transfer of ownership from "P.H." to Foreign Imports, LLC	Borough of Somerville, in the County of Somerset

Count	Date	False Record, Document, or Thing	Application Submitted By:	Falsity	Location
30	1/25/13	Application for New Jersey Certificate of Title, and Supporting Documents, for a 2012 Chevrolet Malibu, VIN/1G1ZA5EU7CF398458	ANTHONY FERRER	State of New York Certificate of Title indicating transfer of ownership from "G.W." to ANTHONY FERRER	Borough of Washington, County of Warren
31	2/13/13	Application for New Jersey Certificate of Title, and Supporting Documents, for a 2012 Chevrolet Malibu, VIN/1G1A5EU5CF398197	ANTHONY FERRER	State of New York Certificate of Title indicating transfer of ownership from "G.W." to ANTHONY FERRER	Borough of Washington, County of Warren
32	9/11/13	Application for a Certificate of Title, and Supporting Documents, for a 2011 BMW Motorcycle, VIN/WB1051706BZV43085	BMW of Manhattan, Inc.	State of New York Certificate of Title indicating transfer of ownership from BMW of Manhattan, Inc., to "P.H."	City of Trenton, County of Mercer

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 THIRTY-THREE THROUGH FORTY-THREE

(Forgery - Third Degree)

ANTHONY FERRER

at the times and places set forth herein, elsewhere, and within the jurisdiction of the Court, with purpose to defraud or injure, did utter to the New Jersey Motor Vehicle Commission, or its agents operating as Customer Service Representatives, a writing, knowing the same to be made, completed, executed, authenticated, issued, or transferred so that it purported to be the act of another who did not authorize that act, as set forth herein:

Count	Date	The Writing	Purported Actor	Location
33	12/4/12	Application for New Jersey Non-Driver's Identification Card	"G.W."	City of East Orange, County of Essex
34	12/10/12	Application for New Jersey Class D Driver's Examination Permit	"G.W."	Borough of Washington, County of Warren
35	3/23/13	Application for New Jersey Class D Driver's Examination Permit	"P.H."	Borough of Washington, County of Warren
36	3/23/13	Application for New Jersey Class D Driver's Examination Permit	"P.H."	Borough of Washington, County of Warren

Count	Date	The Writing	Purported Actor	Location
37	3/23/13	Application for New Jersey Class D Digital Driver's License	"P.H."	Borough of Washington, County of Warren
38	10/9/12	Application for New Jersey Certificate of Title for a 2012 Chevrolet Camaro, VIN/2G1FA1E31C9134681	"P.H."	Borough of Washington, County of Warren
39	10/9/12	Application for New Jersey Vehicle Registration for a 2012 Chevrolet Camaro, VIN/2G1FA1E31C9134681	"P.H."	Borough of Washington, County of Warren
40	8/29/13	Application for Certificate of Title for a 2011 BMW X6, VIN/5UXFG8C54BLZ96771	"P.H."	City of Bayonne, in the County of Hudson
41	11/23/13	Application for New Jersey Certificate of Title for a 2012 Chrysler 300, VIN/2C3CCABG7CH207851	"P.H."	Borough of Washington, County of Warren
42	12/24/13	Application for New Jersey Certificate of Title for a 2014 Jeep Cherokee, VIN/1C4PJMC6EW107820	"P.H."	Borough of Washington, County of Warren

Count	Date	The Writing	Purported Actor	Location
43	12/24/13	Application for New Jersey Registration for a 2014 Jeep Cherokee, VIN/1C4PJMC6EW107820	"P.H."	Borough of Washington, County of Warren

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



AAG Christopher S. Romanyshyn
Deputy Director
Division of Criminal Justice

A TRUE BILL:



, Foreperson

Dated: 7-26-16

FILED

JUL 26 2016

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ687-16-13

Superior Court

Docket Number 16-07-00114 S

STATE OF NEW JERSEY)

v.)

ANTHONY FERRER)

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 26th day of July, 2016, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Warren 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 Warren for filing.



Peter E. Warshaw, J.S.C.