

SUPERIOR COURT OF N.J.  
FILED

MAY 18 2006

DONALD F. FUSLAN  
CLERK

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ524-06-4

Superior Court

Docket Number 06-05-00051ES

STATE OF NEW JERSEY )

v. )

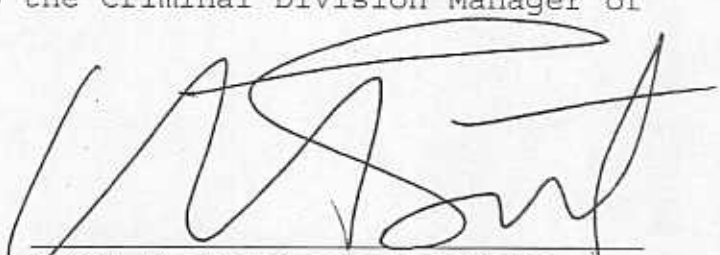
JUANITA RIDDICK )

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 18th day of MAY, 2006, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Essex 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 Essex for filing.

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

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ524-06-4

Superior Court

Docket Number 06-05-00051-3

STATE OF NEW JERSEY )

V. )

INDICTMENT

JUANITA RIDDICK )

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

COUNT ONE

(Conspiracy - Second Degree)

JUANITA RIDDICK

between on or about May 23, 2000 and on or about September 28,  
2005 at the City of Newark, in the County of Essex, elsewhere and  
within the jurisdiction of this Court, with the purpose of  
promoting or facilitating the crimes of Sale of a Simulated  
Document, Official Misconduct and Bribery in Official or  
Political Matters did agree together, and on two occasions did  
agree with another person, whose identity is known to the Grand  
Jurors, who is a co-conspirator but not named as a defendant  
herein, and who at all times relevant to this indictment was an  
agent of the New Jersey Division of Criminal Justice working in  
an undercover capacity, that:

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

that would constitute the aforementioned crimes, or

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

1. Sale of simulated documents, in that one or more of them would knowingly sell, offer, expose for sale, or otherwise transfer, or possess with the intent to sell, offer, or expose for sale, or otherwise transfer, a document, printed form, or other writing which falsely purports to be a driver's license or other document issued by a governmental agency which could be used as a means of verifying a person's identity or age or any other personal identifying information, in violation of N.J.S.A. 2C:21-2.1(a); and

2. Official Misconduct, in that one or more of them, acting with a purpose to obtain benefits in excess of \$200 and being a public servant, that is records clerk supervisor of the City of Newark, did commit acts relating to her office but constituting an unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing such acts in an unauthorized manner, in that the public servant did knowingly accept, process, issue or cause to be processed or issued fraudulent City of Newark birth certificates, in exchange for United States currency, in violation of N.J.S.A. 2C:30-2; and

3. Bribery in Official or Political Matters, in that one

or more of them knowingly did solicit, accept or agree to accept a benefit as consideration for a violation of an official duty, in violation of N.J.S.A. 2C:27c; and

4. Pattern of Official Misconduct, in that one or more of them committed two or more acts of Official Misconduct, in that the said JUANITA RIDDICK, acting with the purpose to obtain benefits in excess of \$200, as a public servant of the City of Newark, did, on more than two occasions, issue or cause to be processed or issued, or both, fraudulent City of Newark birth certificates to individuals based upon fraudulent applications submitted or caused to be submitted by individuals involved in the conspiracy, in exchange for United States currency, in violation of N.J.S.A. 2C:30-7 and N.J.S.A. 2C:30-2.

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

(Sale of a Simulated Document - Second Degree)

JUANITA RIDDICK

between on or about September 20, 2005 and on or about September 28, 2005, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court knowingly did sell, offer or expose for sale, or otherwise transfer, a document or other writing which falsely purports to be a driver's license or other document issued by a governmental agency and which could be used as a means of verifying a person's identity or age or any other personal identifying information, that is, the said JUANITA RIDDICK did sell, offer or expose for sale fictitious City of Newark birth certificates, contrary to the provisions of N.J.S.A. 2C:21-2.1(a) and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Sale of a Simulated Document - Third Degree)

JUANITA RIDDICK

between on or about May 23, 2000 and on or about August 19, 2003, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court knowingly did sell, offer or expose for sale, a document or other writing which falsely purports to be a driver's license or other document issued by a governmental agency and which could be used as a means of verifying a person's identity or age or any other personal identifying information, that is, the said JUANITA RIDDICK did sell, offer or expose for sale fictitious City of Newark birth certificates, contrary to the provisions of N.J.S.A. 2C:21-2.1(a) 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)

JUANITA RIDDICK

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants within this Indictment, between on or about May 23, 2000 and on or about September 28, 2005, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, did commit the offense of Official Misconduct, in that the said JUANITA RIDDICK, acting with a purpose to obtain benefits in excess of \$200, and the said JUANITA RIDDICK, being a public servant, that is, a records clerk supervisor employed by the City of Newark, and thereby having the official functions and duties among others to display good faith, honesty and integrity, to be impervious to corrupting influences, to conduct herself with undivided loyalty to her public trust and to refrain from activities which interfere with the public discharge of her duties which expose her to the temptation of acting in a manner other than in the best interest of the public, the said duties being imposed by law and clearly inherent in the nature of her office, did commit acts relating to her office, but constituting an unauthorized exercise of her official functions, knowing that such acts were unauthorized or that she was committing such acts in an unauthorized manner, in that the said JUANITA RIDDICK did

knowingly accept, process or issue fraudulent City of Newark birth certificates, in exchange for United States currency in excess of \$200, for the benefit of herself, and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, contrary to the provisions of N.J.S.A. 2C:30-2a 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 in Official and Political Matters-Second Degree)

JUANITA RIDDICK

between on or about September 20, 2006 and on or about September 28, 2005 at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, knowingly did solicit, accept or agree to accept a benefit as consideration for a violation of an official duty, that is, the said JUANITA RIDDICK, employed as a records clerk supervisor by the City of Newark, did accept United States currency in excess of \$200 to issue fraudulent City of Newark birth certificates, in violation 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 SIX

(Pattern of Official Misconduct - Second Degree)

JUANITA RIDDICK

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants within this Indictment, between in or about May 23, 2000, and on or about September 28, 2005, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, did commit the offense of Pattern of Official Misconduct, in that the said JUANITA RIDDICK, acting with the purpose to obtain benefits in excess of \$200, and the said JUANITA RIDDICK, being a public servant, that is, a records clerk supervisor of the City of Newark, and thereby having the official functions and duties among others to display good faith, honesty and integrity, to be impervious to corrupting influences, to conduct herself with undivided loyalty to her public trust and to refrain from activities which interfere with the public discharge of her duties which expose her to the temptation of acting in a manner other than in the best interest of the public, the said duties being imposed by law and clearly inherent in the nature of her office, did, on or between the dates herein specified, commit two or more acts relating to her office but constituting unauthorized exercises of her official functions, knowing that such acts were committed in an unauthorized manner, that is, the said JUANITA

RIDDICK, on two or more occasions, knowingly did accept, process or issue fraudulent City of Newark birth certificates in the names of individuals, whose identities are known and unknown to the Grand Jurors, in exchange for United States currency in excess of \$200, for the benefit of herself, JUANITA RIDDICK, and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, contrary to the provisions of N.J.S.A. 2C:30-7a, 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.

Gregory A. Paw, Director  
Division of Criminal Justice

By: Jennifer L. Gottschalk  
Jennifer L. Gottschalk  
Supervising Deputy Attorney General  
Division of Criminal Justice

A TRUE BILL:

Sylvia A. Walker  
Foreperson

Dated: 5-18-06