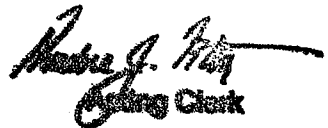


SUPERIOR COURT OF N.J.  
FILED

MAR 19 2007



SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ 536-07-2  
Superior Court 07-03-00021-S  
Docket Number \_\_\_\_\_

STATE OF NEW JERSEY )

v. )

MICHAEL HAILEY )

INDICTMENT

PATRICIA JOHNSON )

JUANITA WORTHY )

KEAH WORTHY )

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

COUNT ONE

(Conspiracy - Second Degree)

MICHAEL HAILEY

PATRICIA JOHNSON

between on or about May 6, 2005, and on or about May 5, 2006, in  
the City of Camden, in the County of Camden, elsewhere and within  
the jurisdiction of this Court, with the purpose of promoting or  
facilitating the commission of the crimes of official misconduct,  
theft by deception and tampering with public records or  
information, did agree together that:

1. 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

2. One or more of them would aid in the planning, or commission of such crimes, or an attempt or solicitation to commit said crimes, that is:

A. Official Misconduct, in that one or more of them, with purpose to obtain a benefit for him/her or another, or to injure or deprive another of a benefit, would commit an act relating to his/her office but constituting an unauthorized exercise of his/her official functions, knowing that such act was unauthorized or that he/she was committing such an act in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a;

B. Theft by Deception, in that one or more of them, would purposely obtain the property of another by deception, by creating or reinforcing a false impression, contrary to the provisions of N.J.S.A. 2C:20-4; and

C. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would knowingly make a false entry in a record, document or thing, belonging to or received or kept by the government, the Camden School District Board of Education, or required by law to be kept by the Camden School District Board of Education, for information or record, or would make, present, offer for filing or use a document, record, 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, the Camden School District Board of Education, or required by law to be kept by the Camden School District Board of Education, for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(1), (2).

3. At all times relevant to the allegations contained in this indictment:

a. Defendant, MICHAEL HAILEY, was employed by the City of Camden School District Board of Education as the Principal of the H.B. Wilson Elementary School located in Camden, New Jersey, and was responsible for supervising teachers and school personnel and overseeing business and facility operations.

b. Defendant, PATRICIA JOHNSON, was employed by the City of Camden School District Board of Education as the Facilitator of the H.B. Wilson Elementary School and was responsible for assisting defendant, MICHAEL HAILEY, supervise teachers and school personnel and oversee business and facility operations.

4. Among the means and methods by which the aforesaid conspirators would carry out the conspiracy are the following:

a. It was part of the conspiracy that the conspirators would prepare field trip requests forms and requisitions and submit them to the City of Camden School District Board of Education for payment authorization.

b. It was further part of the conspiracy that the conspirators did not advise the teachers and school personnel that the City of Camden School District Board of Education agreed to pay, and did in fact pay, for the field trips.

c. It was further part of the conspiracy that the conspirators required the students to pay for the field trips, despite the fact that the City of Camden School District Board of Education had already agreed to pay for the field trips. The students' trips were paid for by the students bringing money from home, by grade level fund raising, and/or by teachers paying for the students.

d. It was further part of the conspiracy that the conspirators would take the money collected from the students and teachers for the field trips and convert the money to their own use.

5. In pursuance of the said conspiracy, the following OVERT ACTS, among others, were committed:

Between on or about May 5, 2005 and May 6, 2006, in the City of Camden, in the County of Camden, the conspirators, MICHAEL HAILEY, PATRICIA JOHNSON, and/or others acting on their behalf, collected money from students and teachers for field trips knowing the City of Camden School District Board of Education had already agreed to pay for those field trips, in the amounts and for the field trips listed below:

<u>Overt Act</u>	<u>Date</u>	<u>Field Trip</u>	<u>Approximate Amount Collected from Students and Teachers</u>
1	5/5/06	Philadelphia	\$ 642.00
2	5/4/06	Philadelphia Zoo	\$1,590.00
3	4/28/06	Penn Relays	\$ 288.00
4	4/25/06	Franklin Institute	\$ 580.00
5	12/2/05	Holiday Light Show	\$ 600.00
6	11/18/05	Johnson Farm	\$ 280.00
7	10/25/05	Duffield's Farm	\$ 348.00
8	10/20/05	Johnson Farm	\$1,539.00
9	10/6/05	Indian Reservation	\$ 280.00
10	6/10/05	Clementon Park	\$4,025.00
11	6/6/05	Storybook Land	\$2,266.00
12	5/31/05	Franklin Institute	\$ 850.00
13	5/6/05	Wheaton Village	\$1,010.00

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)

MICHAEL HAILEY

PATRICIA JOHNSON

between on or about May 6, 2005, and on or about May 5, 2006, in the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, with purpose to obtain a benefit for himself/herself or another or to injure or to deprive another of a benefit, did commit an act relating to his/her official duties, knowing that such act was unauthorized or that he/she was committing such act in an unauthorized manner, and did knowingly refrain from performing an act relating to his/her office but constituting an unauthorized exercise of his/her official functions, knowing that such act was unauthorized or he/she was committing such act in an unauthorized manner, that is, the said MICHAEL HAILEY and PATRICIA JOHNSON, who were employed as Principal and Facilitator, respectively, at the H.B. Wilson Elementary School for the City of Camden School District, having thereby the official functions and duties, among others, to supervise teachers and school personnel, to oversee business and facility operations, to perform his/her duties in a legal and proper manner, to display good faith, honesty, and integrity, and to be impervious to corrupting influences, with the purpose to

obtain a benefit for himself/herself and others in excess of \$200, did collect and keep for his/her own purposes money for field trips from students and teachers as if the field trips were not being funded by the City of Camden School District Board of Education when he/she knew the City of Camden School District Board of Education had agreed to pay for the field trips, 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 THREE

(Theft by Deception - Third Degree)

MICHAEL HAILEY

PATRICIA JOHNSON

between on or about May 6, 2005, and on or about May 5, 2006, in the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, purposely did obtain the property of students and teachers at the H.B. Wilson Elementary School, having a value in excess of \$500 by deception, that is, the said MICHAEL HAILEY and PATRICIA JOHNSON did purposely obtain in excess of \$500 from students and teachers by creating or reinforcing the false impression that money needed to be collected for field trips because the field trips were not paid for by the Camden City School District Board of Education,

WHEREAS, IN TRUTH AND IN FACT, as the said MICHAEL HAILEY and PATRICIA JOHNSON well knew, the Camden City School District Board of Education had agreed to pay for the field trips, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

MICHAEL HAILEY

PATRICIA JOHNSON

on or about July 28, 2005, at the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another did knowingly make a false entry in a record, document, or thing, or 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, the Camden School District Board of Education, or required by law to be kept by the Camden School District Board of Education, for information or record, or required by law to be kept by others for information of the government, that is, the said MICHAEL HAILEY and PATRICIA JOHNSON, with purpose to defraud the students, teachers and Camden City School District Board of Education, purposely and knowingly did present for payment authorization to the Camden City School District Board of Education, field trip request forms knowing them to be false, in that the forms did not state that money was to be collected from the students and teachers to fund the field trips, contrary to the provisions of N.J.S.A. 2C:28-7a(1), (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

(Conspiracy - Second Degree)

MICHAEL HAILEY

PATRICIA JOHNSON

JUANITA WORTHY

KEAH WORTHY

who are named as defendants herein and other persons whose identities are known to the grand jurors who are conspirators, but who are not named as defendants herein, between on or about October 15, 2005, and on or about May 1, 2006, in the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of official misconduct, attempted theft by deception, tampering with public records or information, and tampering with witnesses, did agree together that:

1. One or more of them would engage in conduct which would constitute the aforesaid crimes, or an attempt or solicitation to commit said crimes, or

2. One or more of them would aid in the planning, or commission of said crimes, or an attempt or solicitation to commit said crimes, that is:

A. Official Misconduct, in that one or more of them,

with purpose to obtain a benefit for him/herself or another, would commit an act relating to his/her office but constituting an unauthorized exercise of his/her official functions, knowing that such act was unauthorized or he/she was committing such an act in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a;

B. Theft by Deception, in that one or more of them, would purposely obtain the property of another by deception, by creating or reinforcing a false impression, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1; and

C. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would knowingly make a false entry in a record, document or thing, belonging to or received or kept by the government, the Camden School District Board of Education, or required by law to be kept by the Camden School District Board of Education, for information or record, or would make, present, offer for filing or use a document, record, 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, the Camden School District Board of Education, or required by law to be kept by the Camden School District Board of Education, for information or record, contrary to the provision of N.J.S.A. 2C:28-7a(1) and (2).

3. At all times relevant to the allegations contained in this indictment:

a. Defendant, MICHAEL HAILEY, was employed by the City of Camden School District Board of Education as the Principal of the H.B. Wilson Elementary School located in Camden, New Jersey, and was responsible for supervising teachers and school personnel and overseeing business and facility operations.

b. Defendant, PATRICIA JOHNSON, was employed by the City of Camden School District Board of Education as the Facilitator of the H.B. Wilson Elementary School and was responsible for assisting defendant, MICHAEL HAILEY, in supervising teachers and school personnel and overseeing business and facility operations.

c. Defendant, JUANITA WORTHY, was employed by the City of Camden School District Board of Education as the Principal of the U.S. Wiggins Elementary School located in Camden, New Jersey, and was responsible for supervising teachers and school personnel and overseeing business and facility operations.

d. Defendant, KEAH WORTHY, was employed by the City of Camden School District Board of Education as a teacher at the H.B. Wilson Elementary School and was responsible for helping students to learn by preparing and implementing a course of study including lesson plans, practical skills and field trips.

e. The SCHOOL LEADERSHIP COUNCIL program was developed to serve as a collaborative advisory committee representing a cross-section of the community to improve teaching and learning in Abbott District schools under the leadership of the school principal working in conjunction with teachers, staff, parents, grandparents, guardians, and the community. The roles and responsibilities of the School Leadership Council included, among other things, analyzing student performance, working with the school principal and faculty to identify obstacles to improved student performance, and developing a school report on instructional priorities.

f. In or about 2005, the Camden City School District Board of Education approved the SCHOOL LEADERSHIP COUNCIL for the H.B. Wilson and U.S. Wiggins Elementary Schools to meet once a month, outside of regular school hours, for two hours. Attendance sheets and minutes of the meetings were to be made available to the school community and the Camden City School District Board of Education following each meeting.

4. Among the means and methods by which the aforesaid conspirators would carry out the conspiracy are the following:

a. It was part of the conspiracy that the conspirators did not have School Leadership Council meetings but still submitted requests for payment to the City of Camden School District Board of Education indicating that such meetings had

occurred.

b. It was further part of the conspiracy that the conspirators would prepare false attendance sheets for School Leadership Council meetings and submit those attendance sheets to the City of Camden School District Board of Education for payment.

c. It was further part of the conspiracy that the conspirators compiled work product as if it resulted from the meetings, when in fact the meetings had not taken place and the work product was created after the fact.

d. It was further part of the conspiracy that the conspirators prepared false School Leadership Council Meeting Summary Sheets to be paid for the purported meetings, which did not take place.

e. It was further part of the conspiracy that the conspirators attempted to induce other members of the School Leadership Council to prepare false School Leadership Council Meeting Summary Sheets and falsely inform the City of Camden School District Board of Education personnel that School Leadership Council meetings occurred on specific dates and times at various locations, when in fact they had not occurred.

5. In pursuance of the said conspiracy, the following OVERT ACTS, among others were committed:

a. On or about February 8, 2006, in the City of

Camden, in the County of Camden, the conspirators, MICHAEL HAILEY and PATRICIA JOHNSON caused a request for payment to be submitted in the amount of approximately \$13,721.60, for the purported School Leadership Council meetings for the H.B. Wilson Elementary School on or about the following dates:

October 15, 2005

October 29, 2005

November 12, 2005

December 3, 2005

December 17, 2005

January 7, 2006

January 21, 2006

b. On or about February 9, 2006, in the City of Camden, in the County of Camden, the conspirators, JUANITA WORTHY and PATRICIA JOHNSON, caused a request for payment to be submitted in the amount of approximately \$11,940.92, for the purported School Leadership Council meetings for the U.S. Wiggins Elementary School on or about the following dates:

October 15, 2005

October 29, 2005

November 12, 2005

December 3, 2005

December 17, 2005

January 7, 2006

January 21, 2006

c. On or about May 1, 2006, in the City of Camden, in County of Camden, conspirators, MICHAEL HAILEY, PATRICIA JOHNSON, JUANITA WORTHY and KEAH WORTHY submitted a School Leadership Council Meeting Summary Sheet, which stated that they attended the following purported School Leadership Council meetings, and the dates and times were the same for both the H.B. Wilson Elementary School and for the U.S. Wiggins Elementary School. the summary sheet alleged the following:

<u>Date</u>	<u>Meeting Held</u>	<u>Where</u>	<u>Attended</u>	<u>Hours Met</u>
10/15/05	Yes	Worthy/Evesham	Yes	8-4
10/29/05	Yes	Hailey/Delran	Yes	8-4
11/5/05	Yes	Rutgers/Camden	Yes	3:30-5:30
11/12/05	Yes	Jones/Elkins Park	Yes	8-4
11/26/05	Yes	Vinson/Winslow	Yes	8-4
12/3/05	Yes	Johnson/Atco	Yes	3:30-5:30
12/17/05	Yes	Tucker/Pennsauken	Yes	8-4
1/7/06	Yes	Worthy/Evesham	Yes	8-4
1/14/06	Yes	Rutgers/Camden	Yes	8:30-5:30
1/21/06	Yes	Cooke/Camden	Yes	8-4
2/4/06	Yes	Wiggins	Yes	3:30-5:30
3/4/06	Yes	Wiggins	Yes	3:30-5:30

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 SIX

(Official Misconduct - Second Degree)

MICHAEL HAILEY

PATRICIA JOHNSON

JUANITA WORTHY

KEAH WORTHY

between on or about October 15, 2005, and on or about May 1, 2006, at the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, with purpose to obtain a benefit for himself/herself or another or to injure or to deprive another of a benefit, did commit an act relating to his/her official duties, knowing that such act was unauthorized or that he/she was committing such act in an unauthorized manner, and did knowingly refrain from performing an act relating to his/her office but constituting an unauthorized exercise of his/her official functions, knowing that such act was unauthorized or he/she was committing such act in an unauthorized manner, that is, the said MICHAEL HAILEY, PATRICIA JOHNSON, JUANITA WORTHY and KEAH WORTHY who were employed by the City of Camden School District Board of Education, having thereby the official functions and duties, among others, to perform his/her duties in a legal and proper manner, to display good faith, honesty, and integrity, and to be impervious to corrupting influences, with purpose to obtain a benefit for himself/herself

and others in excess of \$200, did submit false payroll reports to the Camden City School District Board of Education for payment for attendance at the Student Leadership Council meetings, which in fact never took place, 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 SEVEN

(Attempted Theft by Deception - Third Degree)

MICHAEL HAILEY

PATRICIA JOHNSON

JUANITA WORTHY

KEAH WORTHY

between on or about October 15, 2005, and on or about May 1, 2006, in the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, purposely attempted to obtain the property of the Camden City School District Board of Education, having a value in excess of \$500 by deception, that is, the said MICHAEL HAILEY, PATRICIA JOHNSON, JUANITA WORTHY, and KEAH WORTHY, did purposely attempt to obtain in excess of \$500 from the Camden City School District Board of Education by creating or reinforcing the false impression that members of the Student Leadership Council were properly submitting for payment for meetings they were attending,

WHEREAS, IN TRUTH AND IN FACT, as the said MICHAEL HAILEY, PATRICIA JOHNSON, JUANITA WORTHY, and KEAH WORTHY, well knew, the payroll reports submitted to the City of Camden School District Board of Education for payment for attendance at Student Leadership Council meetings were false because the meetings never took place, contrary to the provisions of N.J.S.A. 2C:5-1,

N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Tampering with Public Records or Information - Third Degree)

MICHAEL HAILEY

PATRICIA JOHNSON

on or about February 8, 2006, in the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another did knowingly make a false entry in, or a false alteration of any record, document, or thing belonging to, or received or kept by the government, for information or record, or 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, or required by law to be kept by others for information of the government, that is, the said MICHAEL HAILEY, PATRICIA JOHNSON, JUANITA WORTHY, and KEAH WORTHY with purpose to defraud the City of Camden School District Board of Education, purposely and knowingly did submit a false payroll report for payment to the Camden City School District Board of Education for attendance at Student Leadership Council meetings which never took place, contrary to the provisions of N.J.S.A. 2C:28-7a(1), (2), and N.J.S.A. 2C:2-6, and against the

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

COUNT NINE

(Tampering with Public Records or Information - Third Degree)

JUANITA WORTHY

PATRICIA JOHNSON

on or about February 9, 2006, at the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another did knowingly make a false entry in, or a false alteration of any record, document, or thing belonging to, or received or kept by the government, for information or record, or 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, or required by law to be kept by others for information of the government, that is, the said MICHAEL HAILEY, PATRICIA JOHNSON, JUANITA WORTHY, and KEAH WORTHY with purpose to defraud the City of Camden School District Board of Education, purposely and knowingly did submit a false payroll report for payment to the Camden City School District Board of Education for attendance at Student Leadership Council meetings which never took place, contrary to the provisions of N.J.S.A. 2C:28-7a(1), (2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Tampering with Witnesses - Third Degree)

MICHAEL HAILEY

PATRICIA JOHNSON

JUANITA WORTHY

KEAH WORTHY

between on or about April 26, 2006, and on or about May 1, 2006, at the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, MICHAEL HAILEY, PATRICIA JOHNSON, JUANITA WORTHY, and KEAH WORTHY, knowingly did attempt to induce or otherwise cause Individual 1, Individual 2, and Individual 3, such individuals who are known to the Grand Jury, to each prepare a false School Leadership Council Meeting Summary Sheet and to inform the City of Camden School District Board of Education personnel conducting an investigation into the payment submissions for School Leadership Council meetings, that meetings were held on specific dates at specific locations and times when no meetings ever took place, contrary to the provisions of N.J.S.A. 2C:28-

5a(1), and N.J.S.A. 2C:2-6, and against the peace of this State,  
the government and dignity of the same.

  
\_\_\_\_\_  
Gregory Paw, Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

Dated: 3/19/07

SUPERIOR COURT OF N.J.  
FILED

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

MAR 19 2007

State Grand Jury

Number SGJ536-07-2

Superior Court

Docket Number

07-03-00021-S

  
Clerk

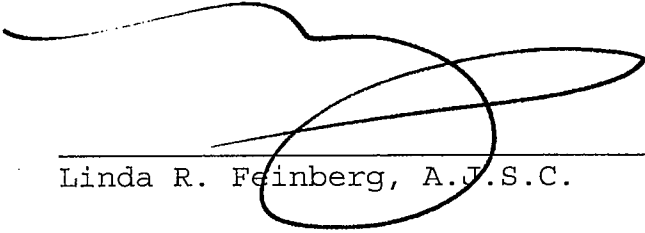
STATE OF NEW JERSEY )  
v. )  
MICHAEL HAILEY )  
PATRICIA JOHNSON )  
JUANITA WORTHY )  
and )  
KEAH WORTHY )

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 19th day of March, 2007, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Camden 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 Camden or filing.

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