

SUPERIOR COURT OF N.J.  
FILED

NOV 16 2007

*Richard J. Miller*  
Acting Clerk

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 550-07-4

Superior Court

Docket Number 07-11-00162-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

DARRYL MILLER )

and )

FRED JEFFERSON )

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

COUNT ONE

(Conspiracy - Second Degree)

DARRYL MILLER

FRED JEFFERSON

between on or about December 1, 2002, and on or about December 31, 2005, at the City of Camden, at the Township of Winslow and at the Township of Gloucester, in the County of Camden, at the Borough of Westville and at the Borough of Glassboro, in the County of Gloucester, at the City of Trenton, in the County of Mercer, 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 himself or another, or to injure or deprive another of a benefit, would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to provision of N.J.S.A. 2C:30-2b;

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 provision of N.J.S.A. 2C:20-4; and

C. Tampering with Public Records or Information, in that one or more of them, with 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 State of New Jersey Division of Motor Vehicles, or required by law to be kept by the State of New Jersey Division of Motor Vehicles, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, or required by law to be kept by the State of New Jersey Division of Motor Vehicles, for information or record, contrary to the provision of N.J.S.A. 2C:28-7a(1), (2).

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

a. Defendant, DARRYL MILLER, was employed by the City of Camden Police Department as a police officer with the responsibility of upholding the laws of the City of Camden and the State of New Jersey, and was an owner/partner in a business known as MJ Transportation Company, LLC, engaged in the business of non-emergency medical transportation.

b. Defendant, FRED JEFFERSON, was employed by the City of Camden Police Department as a police officer with the responsibility of upholding the laws of the City of Camden and the State of New Jersey, and was an owner/partner in a business known as MJ Transportation Company, LLC, engaged in the business of non-emergency medical transportation.

c. MJ TRANSPORTATION COMPANY, LLC, was incorporated during July of 2002, by DARRYL MILLER and FRED JEFFERSON who are the owners and equal partners in the business which engages in non-emergency medical transportation.

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 made application and obtained personal automobile insurance for vehicles used in the business of MJ Transportation Company.

b. It was further part of the conspiracy that the conspirators obtained personal automobile insurance at a cost substantially less than commercial automobile insurance by representing to the insurance companies that the vehicles to be insured were personal vehicles and never disclosing to the insurance companies issuing the automobile insurance policies that the vehicles insured were being used in MJ Transportation Company to transport non-emergency patients.

c. It was further part of the conspiracy that the conspirators registered the vehicles used in the business of MJ Transportation Company with the State of New Jersey Division of Motor Vehicles as personal vehicles.

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

a. Between on or about December 1, 2002 and December 31, 2005, the conspirators, DARRYL MILLER and FRED JEFFERSON, and/or others acting on their behalf, made application or renewed personal automobile insurance policies for vehicles used in

the business of MJ Transportation Company with New Jersey Manufacturers Insurance Company, Liberty Mutual Insurance Company, and AAA Mid- Atlantic Insurance Company, at a cost substantially less than if the vehicles were insured for commercial use, by representing the vehicles were used for personal use only and never disclosing that the vehicles were used in the business of MJ Transportation Company.

b. Between on or about December 1, 2002 and June 30, 2005, the conspirators, DARRYL MILLER and FRED JEFFERSON, who are also City of Camden Police Officers, and/or others acting on their behalf, completed and submitted to the State of New Jersey Division of Motor Vehicles the registrations for vehicles used in the business of MJ Transportation Company representing that the vehicles were for personal use.

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

(Conspiracy - Second Degree)

DARRYL MILLER

FRED JEFFERSON

between on or about June 9, 2003, and on or about December 31, 2005, at the City of Camden, at the Township of Winslow and at the Township of Gloucester, in the County of Camden, at the Borough of Westville and at the Borough of Glassboro, in the County of Gloucester, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of insurance fraud, 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. Insurance Fraud, in that one or more of them, would knowingly make, or causes to be made, a false, fictitious, fraudulent, or misleading statement of material fact in, or omits a material fact from, or causes a material fact to be omitted from, any record, bill, claim or other document, in writing, electronically, orally or in any other form, that a person attempts

to submit, submits, causes to be submitted, or attempts to cause to be submitted as part of, in support of or opposition to or in connection with: (1) a claim for payment, reimbursement or other benefit pursuant to an insurance policy, or from an insurance company or the "Unsatisfied Claim and Judgment Fund Law, "P.L. 1952, c. 174; (2) an application to obtain or renew an insurance policy; (3) any payment made or to be made in accordance with the terms of an insurance policy or premium finance transaction; or (4) an affidavit, certification, record or other document used in any insurance or premium finance transaction;

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

a. Defendant, DARRYL MILLER, was employed by the City of Camden Police Department as a police officer with the responsibility of upholding the laws of the City of Camden and the State of New Jersey, and was an owner/partner in a business known as MJ Transportation Company, LLC, engaged in the business of non-emergency medical transportation.

b. Defendant, FRED JEFFERSON, was employed by the City of Camden Police Department as a police officer with the responsibility of upholding the laws of the City of Camden and the State of New Jersey, and was an owner/partner in a business known as MJ Transportation Company, LLC, engaged in the business of non-

emergency medical transportation.

c. MJ TRANSPORTATION COMPANY, LLC, was incorporated during July of 2002, by DARRYL MILLER and FRED JEFFERSON who are the owners and equal partners in the business which engages in non-emergency medical transportation.

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 made application and obtained personal automobile insurance for vehicles used in the business of MJ Transportation Company.

b. It was further part of the conspiracy that the conspirators obtained personal automobile insurance at a cost substantially less than commercial automobile insurance by representing to the insurance companies that the vehicles to be insured were personal vehicles and never disclosing to the insurance companies issuing the automobile insurance policies that the vehicles insured were being used in MJ Transportation Company to transport non-emergency patients.

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

a. Between on or about June 9, 2003, and December 31, 2005, at the City of Camden, in the County of Camden, the conspirators, DARRYL MILLER and FRED JEFFERSON, and/or others

acting on their behalf, made application or renewed personal automobile insurance policies for vehicles used in the business of MJ Transportation Company with New Jersey Manufacturers Insurance Company, an insurance company that does not issue commercial insurance policies by representing the vehicles were used for personal use only and never disclosing that the vehicles were used in the business of MJ Transportation Company.

b. Between on or about June 9, 2003, and December 31, 2005, the conspirators, DARRYL MILLER and FRED JEFFERSON, and/or others acting on their behalf, made application or renewed personal automobile insurance policies for vehicles used in the business of MJ Transportation Company with New Jersey Manufacturers Insurance Company, Liberty Mutual Insurance Company, and AAA Mid- Atlantic Insurance Company, at a cost substantially less than if the vehicles were insured for commercial use, by representing the vehicles were used for personal use only and never disclosing that the vehicles were used in the business of MJ Transportation Company.

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 THREE

(Official Misconduct - Second Degree)

DARRYL MILLER

FRED JEFFERSON

between on or about December 1, 2002, and on or about December 31, 2005, at the City of Camden, at the Township of Winslow and at the Township of Gloucester, in the County of Camden, at the Borough of Westville and at the Borough of Glassboro, in the County of Gloucester, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for themselves or another or to injure or to deprive another of a benefit, did knowingly refrain from performing a duty which is imposed upon them by law or is clearly inherent in the nature of their office, that is, the said DARRYL MILLER and FRED JEFFERSON, who were employed as police officers with the City of Camden Police Department, having thereby the official functions and duties, among others, to uphold the laws of the City of Camden, the State of New Jersey including the State of New Jersey Motor Vehicle Code, and the laws of the United States of America, to perform their 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 themselves and others in excess of \$200, did falsify vehicle registrations submitted to the State of New Jersey Division of Motor Vehicles to represent that the vehicles

being registered were used as personal vehicles when the vehicles were being used in the business of MJ Transportation Company to transport non-emergency patients, contrary to the provision of N.J.S.A. 2C:30-2b and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT FOUR

(Insurance Fraud - Second Degree)

DARRYL MILLER

FRED JEFFERSON

between on or about June 9, 2003, and on or about December 31, 2005, at the City of Camden, at the Township of Winslow and at the Township of Gloucester, in the County of Camden, at the Borough of Westville and at the Borough of Glassboro, in the County of Gloucester, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did knowingly commit Insurance Fraud, in that the said DARRYL MILLER and FRED JEFFERSON knowingly did commit five or more acts of Insurance Fraud, and the aggregate value of property, services, or other benefit wrongfully obtained is at least \$1,000, and knowingly did make, or did cause to be made, a false, fictitious, fraudulent or misleading statement of material fact in, or knowingly did cause a material fact to be omitted from any record, bill, claim or other document, in writing, electronically or in any other form, which the said DARRYL MILLER and FRED JEFFERSON, did attempt to submit, submit, cause to be submitted or did attempt to cause to be submitted as part of, in support of, or in opposition to or in connection with:

(1) a claim for payment, reimbursement or other benefit pursuant to an insurance policy, or from an insurance company or the

"Unsatisfied Claim and Judgement Fund Law," P.L. 1952, c. 174

(C.39:6-61 et seq.);

(2) an application to obtain or renew an insurance policy;

(3) any payment made or to be made in accordance with the terms of an insurance policy or premium finance transaction; or

(4) an affidavit, certification, record or other document used in any insurance or premium finance transaction;

that is, the said DARRYL MILLER and FRED JEFFERSON, knowingly did commit five or more acts of Insurance Fraud and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000 in that the said DARRYL MILLER and FRED JEFFERSON knowingly made, or caused to be made, false, fictitious, fraudulent or misleading statements of material fact in an application to obtain and/or renew an insurance policy with NJM Insurance Company, Liberty Mutual Insurance Company, and AAA Mid-Atlantic Insurance Company by submitting to NJM Insurance Company, Liberty Mutual Insurance Company, and AAA Mid-Atlantic Insurance Company an application for vehicle insurance and/or a renewal of vehicle insurance representing that the vehicles to be insured were for personal use when the vehicles were being used in the business of MJ Transportation, a company owned by DARRYL MILLER and FRED JEFFERSON, as part of or in connection with a claim for payment, reimbursement or other benefit pursuant to an insurance policy, or from an insurance company or the "Unsatisfied Claim and Judgment Fund Law," , contrary to the

provision of N.J.S.A. 2C:21-4.6(a), and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Theft by Deception - Second Degree)

DARRYL MILLER

FRED JEFFERSON

between on or about December 1, 2002, and on or about December 31, 2005, at the City of Camden, at the Township of Winslow and at the Township of Gloucester, in the County of Camden, at the Borough of Westville and at the Borough of Glassboro, in the County of Gloucester, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did obtain the property of New Jersey Manufacturers Insurance Company, Liberty Mutual Insurance Company and AAA Insurance Company, having a value in the amount of \$75,000 or more, that is, the said DARRYL MILLER and FRED JEFFERSON purposely did obtain property in the amount of \$75,000 or more from New Jersey Manufacturers Insurance Company, Liberty Mutual Insurance Company and AAA Mid-Atlantic Insurance Company by creating or reinforcing the false impression the vehicles were personal vehicles in order to be charged an automobile insurance rate for a personal vehicle,

WHEREAS, IN TRUTH AND IN FACT, as the said DARRYL MILLER and FRED JEFFERSON well knew, the vehicles insured as personal vehicles were used in the business, MJ Transportation Company, and should have been insured at a commercial automobile rate, 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 SIX

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about December 1, 2002, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1992 Plymouth Vogager, New Jersey NLC72K, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 SEVEN

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about February 1, 2003, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Ford Windstar, New Jersey NUF96P, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 EIGHT

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about May 1, 2003, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Dodge Caravan, New Jersey PAJ16C, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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)

DARRYL MILLER

on or about July 1, 2003, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1997 Dodge Wagon, New Jersey NYE27X, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 Public Records or Information - Third Degree)

DARRYL MILLER

on or about December 31, 2003, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1992 Plymouth Voyager, New Jersey NLC72K, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 ELEVEN

(Tampering with Public Records or Information - Third Degree)

FRED JEFFERSON

on or about December 31, 2003, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said FRED JEFFERSON, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Dodge Ram Wagon, New Jersey NNZ65X, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 TWELVE

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about February 28, 2004, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Ford Windstar, New Jersey NUF96P, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 THIRTEEN

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about May 1, 2004, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1992 Ford Econoline, New Jersey RHK18B, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 FOURTEEN

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about May 1, 2004, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1995 Ford Windstar, New Jersey RHK15B, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 FIFTEEN

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about May 31, 2004, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Dodge Caravan, New Jersey PAJ16C, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 SIXTEEN

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about June 1, 2004, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Dodge Caravan, New Jersey RJS91F, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 SEVENTEEN

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about July 31, 2004, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1997 Dodge Wagon, New Jersey NYE27X, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 EIGHTEEN

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

FRED JEFFERSON

on or about December 1, 2004, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said FRED JEFFERSON, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1995 Ford Windstar, New Jersey SAZ15G, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 NINETEEN

(Tampering with Public Records or Information - Third Degree)

FRED JEFFERSON

on or about December 31, 2004, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said FRED JEFFERSON, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Dodge Ram Wagon, New Jersey NNZ65X, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 TWENTY

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about December 31, 2004, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1992 Plymouth Vogager, New Jersey NLC72K, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 TWENTY-ONE

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about February 28, 2005, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Ford Windstar, New Jersey NUF96P, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 TWENTY-TWO

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about May 31, 2005, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1995 Ford Windstar, New Jersey RHK15B, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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 TWENTY-THREE

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

on or about May 31, 2005, at the City of Trenton, in the County of Mercer, 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 record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Dodge Caravan, New Jersey PAJ16C, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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.

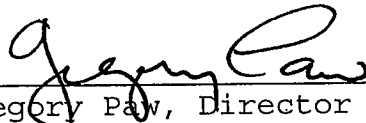
COUNT TWENTY-FOUR

(Tampering with Public Records or Information - Third Degree)

DARRYL MILLER

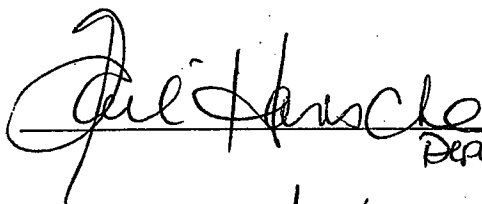
on or about June 30, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose to defraud or injure another did knowingly make a false entry in a record, document, or thing, or make, present, offer for filing or use any record, document or thing knowing it to be false, and with purpose that it be taken as a genuine part of information or record belonging to or received or kept by the government, the State of New Jersey Division of Motor Vehicles, for information or record, or required by law to be kept by others for information of the government, that is, the said DARRYL MILLER, with purpose to defraud the State of New Jersey Division of Motor Vehicles, purposely and knowingly did present a State of New Jersey Division of Motor Vehicle registration form knowing it to be false, in that the registration form indicated that the vehicle, a 1996 Dodge Caravan, New Jersey RJS91F, used in the business of MJ Transportation Company was registered as personal use vehicle only, 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.



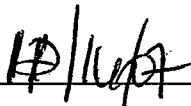
\_\_\_\_\_  
Gregory Paw, Director  
Division of Criminal Justice

A TRUE BILL:



\_\_\_\_\_  
Deputy Foreperson

Dated: \_\_\_\_\_



SUPERIOR COURT OF N.J.  
FILED

NOV 16 2007

  
Assistant Clerk

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ550-07-4

Superior Court

Docket Number

07-11-00162-S

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

DARRYL MILLER )


and )

FRED JEFFERSON )

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

IT IS ORDERED on this 16th day of November, 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 for filing.

  
Neil H. Shuster, J.S.C.