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Andrew J. Pity
Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ534-07-6

Superior Court

Docket Number 01 - 01 - 00006 - S

STATE OF NEW JERSEY)

V.)

STEVE ALBERTO GONZALEZ)

DANIELSON TOMES MUNOZ)

JOSE ESTUARDO CHACON.)

INDICTMENT

JOSE CONDE-HERNANDEZ)

and

YESSICA GONZALEZ)

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

COUNT ONE

(Conspiracy - Second Degree)

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

JOSE ESTUARDO CHACON

and

JOSE CONDE-HERNANDEZ

who are named as defendants herein, and other persons whose

identities are known to the Grand Jurors, who are co-conspirators but not named as defendants herein, on or about February 10, 2005, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose of promoting and facilitating the commission of the crimes of official misconduct, pattern of official misconduct and tampering with public records or information, did conspire, confederate and agree together, that:

1. One or more of them would purposely engage in conduct which would constitute the aforesaid crimes, and

2. One or more of them would aid in the planning, solicitation or commission of the aforesaid crimes, that is,

A. Official Misconduct, in that one or more of them, acting with the purpose to obtain a benefit for himself or another, did commit acts relating to his duties as a New Jersey Motor Vehicle Commission clerk, but constituting an unauthorized exercise of his official functions, knowing that such acts were unauthorized, and who did knowingly make a false entry in, or false alteration of, a record of the New Jersey Motor Vehicle Commission, involving applications for New Jersey Driver's licenses submitted to the New Jersey Motor Vehicle Commission, in violation of N.J.S.A. 2C:30-2a;

B. Pattern of Official Misconduct, in that one or more of them, acting with the purpose to obtain a benefit for

himself or another, did commit two or more acts relating to his duties as a New Jersey Motor Vehicle Commission clerk, but constituting unauthorized exercise of his official functions, knowing that such acts were unauthorized, and who did knowingly make a false entry in, or false alteration of, a record of the New Jersey Motor Vehicle Commission, involving applications for New Jersey Driver's licenses submitted to the New Jersey Motor Vehicle Commission, in violation of N.J.S.A. 2C:30-7;

C. Tampering with Public Records or Information, in that one or more of them, with purpose to defraud or injure the State of New Jersey, did knowingly make a false entry in, or false alteration of, a record of the New Jersey Motor Vehicle Commission involving applications for New Jersey Driver's licenses, knowing them to be false and with purpose that they be taken as a genuine part of the information or records received or kept by government, or required by law to be kept by others for information of the government, in violation of N.J.S.A. 2C:28-7a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

JOSE ESTUARDO CHACON

and

JOSE CONDE-HERNANDEZ

on or about February 10, 2005, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, acting with a purpose to obtain a benefit for themselves or another, or to injure or deprive another of a benefit, the said , being a public servant, 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 himself with undivided loyalty to his public trust and to refrain from activities which interfere with the public discharge of his duties which expose him to the temptation of acting in a manner other than in the best interest of the public, the said duties being imposed by law or clearly inherent in the nature of his office, did commit an act relating to his office, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized or that he was committing such act in an unauthorized manner, in

that the said being a public servant,
that is, a clerk of the New Jersey Motor Vehicle Commission, and
the said STEVE ALBERTO GONZALEZ, DANIELSON TOMES MUNOZ, JOSE
ESTUARDO CHACON, and JOSE CONDE-HERNANDEZ, acting with the
purpose of obtaining a benefit for themselves or another or to
injure or deprive another of a benefit, did knowingly make a
false entry in, or false alteration of, a record of the New
Jersey Motor Vehicle Commission involving an application for New
Jersey Driver's license in the name of Jorge Hidalgo, who is a
law enforcement officer, and whose true identity is known to the
Grand Jurors, who at all times relevant to this Indictment was
acting in an undercover capacity 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

(Official Misconduct - Second Degree)

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

and

JOSE ESTUARDO CHACON

on or about February 10, 2005, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, acting with a purpose to obtain a benefit for themselves or another, or to injure or deprive another of a benefit, the said being a public servant, 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 himself with undivided loyalty to his public trust and to refrain from activities which interfere with the public discharge of his duties which expose him to the temptation of acting in a manner other than in the best interest of the public, the said duties being imposed by law or clearly inherent in the nature of his office, did commit an act relating to his office, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized or that he was committing such act in an unauthorized manner, in that the said being a public servant,

that is, a clerk of the New Jersey Motor Vehicle Commission, and the said STEVE ALBERTO GONZALEZ, DANIELSON TOMES MUNOZ, and JOSE ESTUARDO CHACON, acting with the purpose of obtaining a benefit for themselves or another or to injure or deprive another of a benefit, did knowingly make a false entry in, or false alt_eration of, a record of the New Jersey Motor Vehicle Commission involving an application for New Jersey Driver's license in the name of Leobardo Maldonado, 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 FOUR

(Official Misconduct - Second Degree)

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

and

JOSE ESTUARDO CHACON

on or about February 10, 2005, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, acting with a purpose to obtain a benefit for themselves or another, or to injure or deprive another of a benefit, the said _____, being a public servant, 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 himself with undivided loyalty to his public trust and to refrain from activities which interfere with the public discharge of his duties which expose him to the temptation of acting in a manner other than in the best interest of the public, the said duties being imposed by law or clearly inherent in the nature of his office, did commit an act relating to his office, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized or that he was committing such act in an unauthorized manner, in that the said _____ being a public servant,

that is, a clerk of the New Jersey Motor Vehicle Commission, and the said STEVE ALBERTO GONZALEZ, DANIELSON TOMES MUNOZ, and JOSE ESTUARDO CHACON, acting with the purpose of obtaining a benefit for themselves or another or to injure or deprive another of a benefit, did knowingly make a false entry in, or false alteration of, a record of the New Jersey Motor Vehicle Commission involving an application for New Jersey Driver's license in the name of Huilman Freire, contrary to the provisions of N.J.S.A. 2C:30-2a and N.S.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Official Misconduct - Second Degree)

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

and

JOSE ESTUARDO CHACON

on or about February 10, 2005, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, acting with a purpose to obtain a benefit for themselves or another, or to injure or deprive another of a benefit, the said _____, being a public servant, 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 himself with undivided loyalty to his public trust and to refrain from activities which interfere with the public discharge of his duties which expose him to the temptation of acting in a manner other than in the best interest of the public, the said duties being imposed by law or clearly inherent in the nature of his office, did commit a act relating to his office, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized or that he was committing such act in an unauthorized manner, in that the said _____, being a public servant,

that is, a clerk of the New Jersey Motor Vehicle Commission, and the said STEVE ALBERTO GONZA EZ, DANIELSON TOMES MUNOZ, and JOSE ESTUARDO CHACON, acting with the purpose of obtaining a benefit for themselves or another or to injure or deprive another of a benefit,- did knowingly make a false entry in, or false alteration of, a record of the New Jersey Motor Vehicle Commission involving an application for New Jersey Driver¹s license, in the name of Claudia Pelaez, 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 SIX

(Pattern of Official Misconduct - Second Degree)

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

and

JOSE ESTUARDO CHACON

on or about February 10, 2005, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, acting with a purpose to obtain a benefit for themselves or another, or to injure or deprive another of a benefit, the said , being a public servant, 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 himself with undivided loyalty to his public trust and to refrain from activities which interfere with the public discharge of his duties which expose him to the temptation of acting in a manner other than in the best interest of the public, the said duties being imposed by law or clearly inherent in the nature of his office, did commit two or more acts relating to his office but constituting unauthorized exercise of his official functions, knowing that such acts were committed in an unauthorized manner, that is, the said

being a public servant, that is, a clerk of the New

Jersey Motor Vehicle Commission, and the said STEVE ALBERTO GONZALEZ, DANIELSON TOMES MUNOZ, and JOSE ESTUARDO CHACON, acting with the purpose of obtaining a benefit for themselves or another or to injure or deprive another of a benefit, did knowingly make a false entry in, or false alteration of, records of the New Jersey Motor Vehicle Commission involving applications for New Jersey Driver's license in the names of Leobardo Maldonado, Huilman Freire, Claudia Pelaez, and Jorge Hidalgo, a law enforcement officer, and whose true identity is known to the Grand Jurors, who at all times relevant to this Indictment was acting in an undercover capacity, contrary to the provisions of N.J.S.A. 2C:30-7, N.J.S.A. 2C:30-a, and N.J.S.A. 2C:2-6, and against the peace- of tht-s State,- the government- and dignity of the same ..

COUNT SEVEN

(Tampering with Public Records or Information - Third Degree)

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

JOSE ESTUARDO CHACON

and

JOSE CONDE-HERNANDEZ

on or about February 10, 2005, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with purpose to defraud or injure another, did knowingly make a false entry in, or false alteration of, a record, knowing it to be false and with the purpose that it be taken as a genuine part of the information or records 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 , STEVE ALBERTO GONZALEZ, DANIELSON TOMES MUNOZ, JOSE ESTUARDO CHACON, and JOSE CONDE-HERNANDEZ, with purpose to defraud or injure the State of New Jersey, did knowingly make a false entry in, or false alteration of, a record of the New Jersey Motor Vehicle Commission involving an application for New Jersey Driver's license, in the name of Jorge Hidalgo, who is a law enforcement officer, and whose true identity is known to the Grand Jurors, knowing that it contained

false information concerning the identity or pedigree information of that individual, contrary to the provisions of N.J.S.A. 2C:28-7a(1) 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)

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

and

JOSE ESTUARDO CHACON

on or about February 10, 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, or false alteration of, a record, knowing it to be false and with purpose that it be taken as a genuine part of the information or records 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 DARNELL LAMONT BRICKER, STEVE ALBERTO GONZALEZ, DANIELSON TOMES MUNOZ and JOSE ESTUARDO CHACON, with purpose to defraud or injure the State of New Jersey, did knowingly make a false entry in, or false alteration of, a record of the New Jersey Motor Vehicle Commission involving an application for New Jersey Driver's license, in the name of Leobardo Maldonado, knowing that it contained false information concerning the identity or pedigree information of that individual, contrary to

the provisions of N.J.S.A. 2C:28-7a(1) 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).

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

and

JOSE ESTUARDO CHACON

on or about February 10, 2005, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with purpose to defraud or injure another, did knowingly make a false entry in, or false alteration of, a record, knowing it to be false and with the purpose that it be taken as a genuine part of the information or records 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 , STEVE ALBERTO GONZALEZ, DANIELSON TOMES MUNOZ and JOSE ESTUARDO CHACON, with purpose to defraud or injure the State of New Jersey, did knowingly make a false entry in, or false alteration of, a record of the New Jersey Motor Vehicle Commission involving an application for New Jersey Driver's license in the name of Huilman Freire, knowing that it contained false information concerning the identity or pedigree information of that individual, contrary to the provisions of

N.J.S.A. 2C:28-7a(1) 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)

STEVE ALBERTO GONZALEZ

DANIELSON TOMES MUNOZ

and

JOSE ESTUARDO CHACON

on or about February 10, 2005, at the City of Trenton, in the County of Mercer., elsewhere and within the jurisdiction of this Court, with purpose to defraud or injure another, did knowingly make a false entry in, or false alteration of, a record, knowing it to be false and with the purpose that it be taken as a genuine part of the information or records 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 DARNELL LAMONT BRICKERS, STEVE ALBERTO GONZALEZ, DANIELSON TOMES MUNOZ, and JOSE ESTUARDO CHACON, with purpose to defraud or injure the State of New Jersey, did knowingly make a false entry in, or false alteration of, a record of the New Jersey Motor Vehicle Commission involving an application for New Jersey Driver's license in the name of Claudia Pelaez, knowing that it contained false information concerning the identity or pedigree information of that individual, contrary to the provisions of

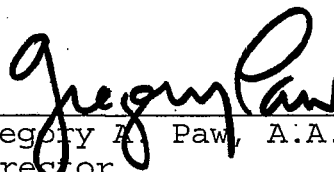
N.J.S.A. 2C:28-7a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Hindering Apprehension or Prosecution - Third Degree)

YESSICA GONZALEZ

on or about February 10, 2005, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to hinder the investigation, prosecution, conviction or punishment of Steve Alberto Gonzalez for an offense, did purposely give false information to law enforcement officers, contrary to the provisions of N.J.S.A. 2C:29-3a(7), and against the peace of this State, the government and dignity of the same.



Gregory A. Paw, A.A.G.
Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: / / () **7**