

SEP 29 2008

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 561-08-9

Superior Court      08-09-00232-S  
Docket Number \_\_\_\_\_

**FILED**

V.

SEP 30 2008

INDICTMENT

ADEL MIKHAEL,

**SUPERIOR COURT  
CLERK'S OFFICE**

ALBERTO VASQUEZ,

WILLIAM CHADWICK,

KENNETH SISK,

TREVOR WILLIAMS, AND

JAMES IRIZARRY.

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

COUNT ONE

(Conspiracy - Second Degree)

ADEL MIKHAEL

ALBERTO VASQUEZ

WILLIAM CHADWICK

KENNETH SISK

TREVOR WILLIAMS

AND

JAMES IRIZARRY

between on or about April 21, 2003 and January 8, 2008, at the Township of Parsippany-Troy Hills, in the County of Morris, at the City of Jersey City, in the County of Hudson, 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 commission of the crimes of Official Misconduct, Acceptance or Receipt of Unlawful Benefit by Public Servant for Official Behavior, Offer of Unlawful Benefit to Public Servant for Official Behavior, Theft By Deception, Commercial Bribery and Breach of Duty to Act Disinterestedly, Falsifying or Tampering with Records, Financial Facilitation of Criminal Activity, Tampering With Witnesses and Informants, Hindering Apprehension or Prosecution, and/or Fabricating Physical Evidence, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crime(s), or

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

1. that the said ALBERTO VASQUEZ, WILLIAM CHADWICK and/or KENNETH SISK, each acting with the purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit in excess of \$200, would each commit acts relating to his office, but constituting an unauthorized exercises of his official functions, knowing that such acts were unauthorized or

that he was committing them in an unauthorized manner, or would knowingly refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office; that is, the said ALBERTO VASQUEZ, WILLIAM CHADWICK and/or KENNETH SISK, each then and there being a public servant, to wit, respectively: a detective in the Hudson County Sheriff's Office, a Lieutenant in the Hudson County Sheriff's Office, or a Lieutenant in the Hudson County Prosecutor's Office, each having thereby the official functions and duties, among others, to obey and enforce the law, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, would purposefully and knowingly sign false documents, to wit: Certificates of Surrender of Prisoner by Bondsman, Certificates of Surrender and/or Body Receipts, presented to each by the said ADEL MIKHAEIL, with the purpose to secure a benefit to himself or another in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2;

2. under color of his office and in connection with any official act to be performed as a public servant, directly or indirectly, knowingly solicit, accept or agree to accept a benefit in excess of \$200, to influence the performance of an official duty or to commit a violation of official duty, contrary to the provisions of N.J.S.A. 2C:27-10;

3. directly or indirectly, confer or agree to confer a

benefit not allowed by law, to wit: funds in excess of \$200 and/or liquor with a value in excess of \$200, to a public servant to influence the performance of an official duty or to commit a violation of official duty, contrary to the provisions of N.J.S.A. 2C:27-11;

4. purposely obtain in excess of \$500, from Harco National Insurance Company, De Los Insurance Company, formerly known as Sirius America Insurance Company, Aegis Security Insurance Company, and Safety National Insurance Company and/or from the County of Hudson, the County of Essex and/or the State of New Jersey, through the aforesaid Harco National Insurance Company, De Los Insurance Company, formerly known as Sirius America Insurance Company, Aegis Security Insurance Company, and Safety National Insurance Company, by deception, by creating or reinforcing the false impression that the said ADEL MIKHAEIL captured certain fugitives, whose identities are known to the grand jurors and turned said fugitives over to law enforcement officers, to wit: the said ALBERTO VASQUEZ, WILLIAM CHADWICK and/or KENNETH SISK, and submit the false documents, to wit: Certificates of Surrender by Bondsman, Certificates of Surrender and/or Body Receipts, in support of said claims, WHEREAS, in truth and in fact, as the said ADEL MIKHAEIL, ALBERTO VASQUEZ, WILLIAM CHADWICK and/or KENNETH SISK well knew, the said ADEL MIKHAEIL did not capture and turn over the aforesaid fugitives to

the said ALBERTO VASQUEZ, WILLIAM CHADWICK and/or KENNETH SISK, thereby obtaining for the said ADEL MIKHAEIL funds in excess of \$500, contrary to the provisions of N.J.S.A. 2C:20-4;

5. confer, offer or agree to confer a benefit of over \$75,000 on John Sullivan as consideration for knowingly violating or agreeing to violate a duty of fidelity to which the said John Sullivan was subject to as an employee of DeLos Insurance Company, formerly known as Sirius America Insurance Company, that is the said ADEL MIKHAEIL would confer, offer or agree to confer one or more payments of funds in an amount totaling over \$75,000 to John Sullivan, an employee of DeLos Insurance Company, formerly known as Sirius America Insurance Company, as consideration for John Sullivan assigning fugitive recovery work to the said ADEL MIKHAEIL and/or as consideration for the prompt approval of invoices submitted by the said ADEL MIKHAEIL, contrary to the provisions of N.J.S.A. 2C:21-10;

6. confer, offer or agree to confer a benefit of over \$1,000 on the said JAMES IRIZARRY and the said JAMES IRIZARRY to solicit, accept or agree to accept the aforesaid funds as consideration for knowingly violating or agreeing to violate a duty of fidelity to which the said JAMES IRIZARRY was subject to as an employee of Surety Administrators, Incorporated, that is the said ADEL MIKHAEIL would confer, offer or agree to confer one or more payments of funds in an amount totaling over \$1,000 to

the said JAMES IRIZARRY, an employee of Surety Administrators, Incorporated, and the said JAMES IRIZARRY would solicit, accept or agree to accept the aforesaid funds as consideration for the said JAMES IRIZARRY assigning fugitive recovery work to the said ADEL MIKHAEIL and/or as consideration for the prompt approval of invoices submitted by the said ADEL MIKHAEIL, contrary to the provisions of N.J.S.A. 2C:21-10;

7. with purpose to deceive or injure another or to conceal a wrongdoing, knowing it to contain a false statement or information, falsify and/or utter a writing or record, that is, one or more Certificates of Surrender of Prisoner by Bondsman, Certificates of Surrender, Body Receipts and/or promissory notes, contrary to the provisions of N.J.S.A. 2C:21-4(a);

8. engage in one or more transactions involving property, to wit: funds of \$75,000 or more, which the said ADEL MIKHAEIL AND TREVOR WILLIAMS knew or which a reasonable person would believe to be derived from criminal activity, to wit: Commercial Bribery, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is the said ADEL MIKHAEIL AND TREVOR WILLIAMS, would complete and sign false promissory notes and did agree with or aid another, whose identity is known to the grand jury in signing a false promissory note, the value of all the

aforesaid false promissory notes being approximately \$100,000, in order to conceal or disguise the nature, location, source, ownership or control of the funds derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25(b)(2), N.J.S.A. 2C:21-27;

9. believing that an official proceeding or investigation was pending or about to be instituted, knowingly attempt to induce or otherwise cause John Sullivan to testify or inform falsely or withhold any testimony, information, document or thing, contrary to the provisions of N.J.S.A. 2C:28-5(a);

10. with purpose to hinder their own apprehension, prosecution, conviction or punishment and/or the apprehension, prosecution, conviction or punishment of another, give false information to a law enforcement officer, contrary to the provisions of N.J.S.A. 2C:29-3(b); and/or

11. believing that an official proceeding or investigation was pending or about to be instituted, knowingly make, devise or prepare an object, article, record document or other thing of physical substance, that is: one or more promissory notes, knowing it to be false and with purpose to mislead a public servant who is engaged in such proceeding or investigation, contrary to the provisions of N.J.S.A. 2C:28-6(2)

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

COUNT TWO

(Official Misconduct - Second Degree)

ADEL MIKHAEIL

and

ALBERTO VASQUEZ

between on or about April 21, 2003 and on or about May 22, 2006, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said ALBERTO VASQUEZ, acting with the purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, and the said ALBERTO VASQUEZ, then and there being a public servant, to wit: a detective in the Hudson County Sheriff's Office, having thereby the official functions and duties, among others, to obey and enforce the law, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did sign false documents to wit: Certificates of Surrender of Prisoner by Bondsman, Certificates of Surrender and/or Body Receipts, presented to him by the said ADEL MIKHAEIL, with the purpose to secure a benefit to himself or another in



excess of \$200, contrary to the provisions of 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 same.

COUNT THREE

(Official Misconduct - Second Degree)

ADEL MIKHAEL

and

WILLIAM CHADWICK

between on or about April 21, 2003 and on or about May 22, 2006, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said WILLIAM CHADWICK, acting with the purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, and the said WILLIAM CHADWICK, then and there being a public servant, to wit: a Lieutenant in the Hudson County Sheriff's Office, having thereby the official functions and duties, among others, to obey and enforce the law, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did sign false documents to wit: Certificates of Surrender of Prisoner by Bondsman, Certificates of Surrender and/or Body Receipts, presented to him by the said ADEL MIKHAEL, with the purpose to secure a benefit to himself or another in

excess of \$200, contrary to the provisions of 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 same.

COUNT FOUR

(Official Misconduct - Second Degree)

ADEL MIKHAEIL

and

KENNETH SISK

between on or about April 21, 2003 and on or about May 22, 2006, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said KENNETH SISK, acting with the purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit acts relating to his office, but constituting unauthorized exercises of his official functions, knowing that such acts were unauthorized or that he was committing them in an unauthorized manner, and the said KENNETH SISK, then and there being a public servant, to wit: a Lieutenant in the Hudson County Prosecutor's Office, having thereby the official functions and duties, among others, to obey and enforce the law, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did sign false documents to wit: Certificates of Surrender of Prisoner by Bondsman, Certificates of Surrender and/or Body Receipts, presented to him by the said ADEL MIKHAEIL, with the purpose to secure a benefit to himself or another in excess of

\$200, contrary to the provisions of 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 same.

COUNT FIVE

(Acceptance or Receipt of Unlawful Benefit by  
Public Servant - Second Degree)

WILLIAM CHADWICK

between on or about January 14, 2004 and on or about May 22, 2006, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, under color of his office and in connection with any official act to be performed by the said WILLIAM CHADWICK as a public servant, to wit: a Lieutenant with the Hudson County Sheriff's Office, the said WILLIAM CHADWICK, directly or indirectly, knowingly solicited, accepted or agreed to accept a benefit in excess of \$200, to influence the performance of an official duty or to commit a violation of official duty, contrary to the provisions of N.J.S.A. 2C:27-10, and against the peace of this State, the government and dignity of same.

COUNT SIX

(Offer of Unlawful Benefit to Public Servant for  
Official Behavior - Second Degree)

ADEL MIKHAEIL

between on or about January 14, 2004 and on or about May 22, 2006, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did, directly or indirectly, confer or agree to confer a benefit not allowed by law, to wit: funds in excess of \$200 and/or liquor with a value in excess of \$200 to a public servant, to wit: WILLIAM CHADWICK, a Lieutenant with the Hudson County Sheriff's Office, and/or KENNETH SISK, a Lieutenant with the Hudson County Prosecutor's Office, to influence the performance of an official duty or to commit a violation of official duty, contrary to the provisions of N.J.S.A. 2C:27-11, and against the peace of this State, the government and dignity of same.

COUNT SEVEN

(Theft By Deception - Third Degree)

ADEL MIKHAEIL

ALBERTO VASQUEZ

WILLIAM CHADWICK

and

KENNETH SISK

between on or about April 21, 2003 and on or about September 19, 2007, at the City of Jersey City, in the County of Hudson, at the City of Newark, in the County of Essex, at the Township of Parsippany-Troy Hills, in the County of Morris, elsewhere, and within the jurisdiction of this Court, purposely did obtain in excess of \$500, from Harco National Insurance Company, De Los Insurance Company, formerly known as Sirius America Insurance Company, Aegis Security Insurance Company, and Safety National Insurance Company and/or from the County of Hudson, the County of Essex and/or the State of New Jersey, through the aforesaid Harco National Insurance Company, De Los Insurance Company, formerly known as Sirius America Insurance Company, Aegis Security Insurance Company, and Safety National Insurance Company, by deception, by creating or reinforcing the false impression that the said ADEL MIKHAEIL captured certain fugitives, whose identities are known to the grand jurors and turned said fugitives over to law enforcement officers, to wit: the said



ALBERTO VASQUEZ, WILLIAM CHADWICK and/or KENNETH SISK, and did submit the false documents, to wit: Certificates of Surrender by Bondsman, Certificates of Surrender and/or Body Receipts, in support of said claims, thereby obtaining for the said ADEL MIKHAEIL funds in excess of \$500;

WHEREAS, in truth and in fact, as the said ADEL MIKHAEIL, ALBERTO VASQUEZ, WILLIAM CHADWICK and/or KENNETH SISK well knew, the said ADEL MIKHAEIL did not capture and turn over the aforesaid fugitives to the said ALBERTO VASQUEZ, WILLIAM CHADWICK and/or KENNETH SISK, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT EIGHT

(Commercial Bribery - Second Degree)

ADEL MIKHAEIL

between on or about February 1, 2006 and on or about January 8, 2008, at the Township of Parsippany-Troy Hills, in the County of Morris, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did confer, offer or agree to confer a benefit of over \$75,000, to wit: funds totaling approximately \$92,550, on John Sullivan as consideration for knowingly violating or agreeing to violate a duty of fidelity to which the said John Sullivan was subject to as an employee of DeLos Insurance Company, formerly known as Sirius America Insurance Company, that is the said ADEL MIKHAEIL did confer, offer or agree to confer one or more payments of funds in an amount totaling over \$75,000 to John Sullivan, an employee of DeLos Insurance Company, formerly known as Sirius America Insurance Company, as consideration for John Sullivan assigning fugitive recovery work to the said ADEL MIKHAEIL and/or as consideration for the prompt approval of invoices submitted by the said ADEL MIKHAEIL, contrary to the provisions of N.J.S.A. 2C:21-10, and against the peace of this State, the government and dignity of same.

COUNT NINE

(Commercial Bribery - Third Degree)

ADEL MIKHAEIL

and

JAMES IRIZARRY

between on or about July 1, 2004 and on or about December 31, 2005, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, the said ADEL MIKHAEIL did confer, offer or agree to confer a benefit of over \$1,000, to wit: funds totaling approximately \$2,600, on the said JAMES IRIZARRY and/or other employees of Surety Administrators, Incorporated, who are known to the Grand Jury but not charged herein, and the said JAMES IRIZARRY did solicit, accept or agree to accept the aforesaid funds as consideration for knowingly violating or agreeing to violate a duty of fidelity to which the said JAMES IRIZARRY and/or other employees of Surety Administrators, Incorporated were subject to as an employee of Surety Administrators, Incorporated, that is the said ADEL MIKHAEIL did confer, offer or agree to confer one or more payments of funds in an amount totaling over \$1,000 to the said JAMES IRIZARRY, an employee of Surety Administrators, Incorporated, and/or other employees of Surety Administrators, Incorporated, who are known to the Grand Jury but not charged herein, and the said JAMES IRIZARRY did solicit, accept or agree

to accept the aforesaid funds as consideration for assigning fugitive recovery work to the said ADEL MIKHAEIL and/or as consideration for the prompt approval of invoices submitted by the said ADEL MIKHAEIL, contrary to the provisions of N.J.S.A. 2C:21-10 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT TEN

(Falsifying Records - Fourth Degree)

ADEL MIKHAEL

ALBERTO VASQUEZ

WILLIAM CHADWICK

and

KENNETH SISK

between on or about April 21, 2003 and on or about May 22, 2006, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, with purpose to deceive or injure another or to conceal a wrongdoing, knowing it to contain a false statement or information, did falsify and/or utter a writing or record, that is, one or more Certificates of Surrender of Prisoner by Bondsman, Certificates of Surrender and/or Body Receipts, contrary to the provisions of N.J.S.A. 2C:21-4(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT ELEVEN

(Falsifying Records - Fourth Degree)

ADEL MIKHAEIL

and

TREVOR WILLIAMS

on or about December 19, 2007, at the Township of Parsippany-Troy Hills, in the County of Morris, elsewhere, and within the jurisdiction of this Court, with purpose to deceive or injure another or to conceal a wrongdoing, knowing it to contain a false statement or information, did falsify and/or utter a writing or record, that is, one or more promissory notes, contrary to the provisions of N.J.S.A. 2C:21-4(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT TWELVE

(Financial Facilitation of Criminal Activity - Second Degree)

ADEL MIKHAEIL

and

TREVOR WILLIAMS

on or about December 19, 2007, at the Township of Parsippany-Troy Hills, in the County of Morris, elsewhere, and within the jurisdiction of this Court, engaged in one or more transactions involving property, to wit: funds of \$75,000 or more, which the said ADEL MIKHAEIL AND TREVOR WILLIAMS knew or which a reasonable person would believe to be derived from criminal activity, to wit: Commercial Bribery, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is the said ADEL MIKHAEIL AND TREVOR WILLIAMS, did complete and sign false promissory notes and did agree with or aid another, whose identity is known to the grand jury in signing a false promissory note, the value of all the aforesaid false promissory notes being approximately \$100,000, in order to conceal or disguise the nature, location, source, ownership or control of the funds derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25(b)(2), N.J.S.A. 2C:21-27 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT THIRTEEN

(Witness Tampering - Third Degree)

ADEL MIKHAEL

and

TREVOR WILLIAMS

between on or about December 1, 2007 and on or about January 8, 2008, at the Township of Parsippany-Troy Hills, in the County of Morris, elsewhere, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, knowingly did attempt to induce or otherwise cause John Sullivan to testify or inform falsely or withhold any testimony, information, document or thing, contrary to the provisions of N.J.S.A. 2C:28-5(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.



COUNT FOURTEEN

(Hindering Apprehension or Prosecution - Third Degree)

ADEL MIKHAEL

and

TREVOR WILLIAMS

between on or about December 1, 2007 and on or about January 8, 2008, at the Township of Parsippany-Troy Hills, in the County of Morris, elsewhere, and within the jurisdiction of this Court, with purpose to hinder their own apprehension, prosecution, conviction or punishment and/or the apprehension, prosecution, conviction or punishment of another, did give false information to a law enforcement officer, contrary to the provisions of N.J.S.A. 2C:29-3(b) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT FIFTEEN

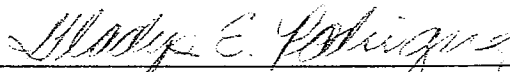
(Fabricating Physical Evidence - Fourth Degree)

ADEL MIKHAEL

and

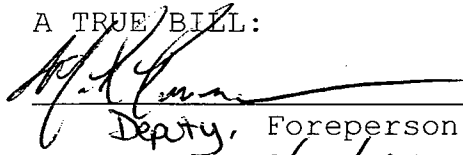
TREVOR WILLIAMS

between on or about December 1, 2007 and on or about January 8, 2008, at the Township of Parsippany-Troy Hills, in the County of Morris, elsewhere, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, knowingly did make, devise or prepare an object, article, record document or other thing of physical substance, that is: one or more promissory notes, knowing it to be false and with purpose to mislead a public servant who is engaged in such proceeding or investigation, contrary to the provisions of N.J.S.A. 2C:28-6(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.



Gladys E. Rodriguez, Deputy Director  
Division of Criminal Justice

A TRUE BILL:

  
Deputy Foreperson

Dated: 9/29/08

RECEIVED

SEP 29 2008

SUPERIOR COURT  
CLERK'S OFFICE

FILED

SEP 30 2008

SUPERIOR COURT  
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

Number SGJ561-08-9

Superior Court  
Docket Number

08-09-00232-S

STATE OF NEW JERSEY )

v. )

ADEL MIKHAEIL )

ALBERTO VASQUEZ )

WILLIAM CHADWICK )

KENNETH SISK )

TREVOR WILLIAMS )

and )

JAMES IRIZARRY )

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 29th day of September, 2008, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Morris 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 Morris for filing.

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