

FILED

DEC 13 2010

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ596-10-9

Docket Number 10-12-00179-S

STATE OF NEW JERSEY)

v.)

ANNA TALIAFERRO)

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

COUNT ONE

(Official Misconduct - Second Degree)

ANNA TALIAFERRO

between on or about February 13, 2003 and on or about July 6,
2007, at the City of Paterson, in the County of Passaic,
elsewhere, and within the jurisdiction of this Court, did commit
the offense of Official Misconduct, in that the said ANNA
TALIAFERRO, a public servant, acting with the purpose to obtain a
benefit for herself or another, or to injure or deprive another
of a benefit in excess of \$200, did commit acts relating to her
office, constituting unauthorized exercises of her official
functions, knowing that such acts were unauthorized or that she
was committing them in an unauthorized manner, and the said ANNA
TALIAFERRO then and there being a public servant, to wit:
District-Wide Coordinator and Director of the Paterson Resource

Center, an entity of the Paterson School District, having been charged with the official functions and duties, among others: (a) participate and become involved in No Child Left Behind and other educational conferences on the local, state and national level which were paid for under the Title One program funded by taxpayers; (b) observe strictly, to avoid the appearance of conflict, all requirements of the School Ethics Act (N.J.S.A. 18A:12-21 et. seq.) regarding conflicts of interest in employment, purchasing, and other decisions, including solicitation and acceptance of gifts and favors; (c) to not use or attempt to use her official position to secure unwarranted privileges for herself or others; (d) to not act in an official capacity in any matter where she, a member of her immediate family or business organization in which she has interest has a direct or indirect financial or personal involvement that might reasonably be expected to impair her objectivity or independence of judgment in exercise of her official functions; (e) submit in a timely fashion the required annual disclosure statement regarding employment and financial interests; and (f) to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did, with the purpose to secure a benefit for herself in excess of \$200, knowingly fail to list in the required annual disclosure her employment and financial interests as President and owner of the New Jersey Association of Parent Coordinators,

Inc." ("NJAPC"); create or reinforce the false impression to the Paterson School District that the NJAPC was an independent business entity with no direct or indirect financial or personal involvement by ANNA TALIAFERRO or a family member; hire the NJAPC as an outside vendor for the Paterson School District to prepare and hold educational conferences which were paid for under the Title One program funded by taxpayers; utilize Paterson School District employees, equipment, or supplies on behalf of the NJAPC to prepare and hold said educational conferences; falsely or improperly charged the Paterson School District through the NJAPC for memberships, items, or services related to said educational conferences; or directed a subordinate Paterson School District employee to forge the signature of another employee on a NJAPC check, having a value in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2a, N.J.S.A. 2C:2-6, and N.J.S.A. 2C:2-7 and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Pattern of Official Misconduct - Second Degree)

ANNA TALIAFERRO

between on or about February 13, 2003 and on or about July 6, 2007, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did commit the offense of Pattern of Official Misconduct in that she did commit two or more acts of Official Misconduct, each in violation of N.J.S.A. 2C:30-2, that is, the said ANNA TALIAFERRO, then and there being a public servant, to wit: District-Wide Coordinator and Director of the Paterson School District, having been charged with the official functions and duties, among others: (a) participate and become involved in No Child Left Behind and other educational conferences on the local, state and national level which were paid for under the Title One program funded by taxpayers; (b) observe strictly, to avoid the appearance of conflict, all requirements of the School Ethics Act (N.J.S.A. 18A:12-21 et. seq.) regarding conflicts of interest in employment, purchasing, and other decisions, including solicitation and acceptance of gifts and favors; (c) to not use or attempt to use her official position to secure unwarranted privileges for herself or others; (d) to not act in an official capacity in any matter where she, a member of her immediate family or business organization in which she has interest has a direct or indirect financial or personal involvement that might

reasonably be expected to impair her objectivity or independence of judgment in exercise of her official functions; (e) submit in a timely fashion the required annual disclosure statement regarding employment and financial interests; and (f) to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did commit two or more acts of Official Misconduct, at least one of which was a crime of the second degree including, but not limited to those acts and omissions described in Count One, which allegations are incorporated by reference as fully set forth herein, contrary to the provisions of N.J.S.A. 2C:30-7a, N.J.S.A. 2C:2-6, and N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Second Degree)

ANNA TALIAFERRO

between on or about February 13, 2003 and on or about July 6, 2007, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, purposely did obtain monies from the Paterson School District having a value of approximately \$102,226.81, by deception, by creating or reinforcing false impressions on one or more invoices submitted to the Paterson School District by the New Jersey Association of Parent Coordinators, Inc., to wit: falsely or improperly charging the Paterson School District for memberships, items, or services related to educational conferences, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:2-6, and N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

.. ..
COUNT FOUR

(Tampering With Public Records or Information - Third Degree)

ANNA TALIAFERRO

between on or about April 10, 2003 and on or about April 27, 2007, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did knowingly make a false entry in a record, document or thing belonging to, 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, made false entries in one or more annual: School Ethics Commission Financial Disclosure Statements and/or School Ethics Commission Personal/Relative Disclosure Statements, for the years 2002 to 2006, knowing the entries to be false, contrary to the provisions of N.J.S.A. 2C:28-7(a)(1), N.J.S.A. 2C:2-6, and N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of same.

COUNT FIVE

(Tampering With Public Records or Information - Third Degree)

ANNA TALIAFERRO

between on or about February 13, 2003 and on or about April 29, 2007, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did knowingly make a false entry in a record, document or thing belonging to, 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, one or more invoices falsely or improperly charging the Paterson School District for memberships, items, or services related to educational conferences prepared and held by the New Jersey Association of Parent Coordinators, Inc., contrary to the provisions of N.J.S.A. 2C:28-7(a)(1), N.J.S.A. 2C:2-6, and N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of same.

COUNT SLX ..

(Forgery - Third Degree)

ANNA TALIAFERRO

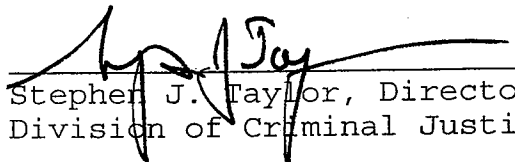
between on or about June 29, 2007 and on or about July 6, 2007, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did, with purpose to defraud or injure anyone, or with knowledge that she was facilitating a fraud or injury to be perpetrated by anyone, utter a writing of another which she knew was forged; that is, the said ANNA TALIAFERRO did present as authentic and deposit a New Jersey Association of Parent Coordinators, Inc., check for \$25,000 (twenty five thousand dollars) knowing that the check was not authorized and the payor signature was forged, contrary to N.J.S.A. 2C:21-1a(3), N.J.S.A. 2C:2-6, and against the peace of the State, the government and dignity of the same.

- COUNT SEVEN -

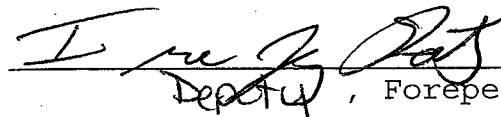
(Misconduct by Corporate Official - Second Degree)

ANNA TALIAFERRO

between on or about February 13, 2003 and on or about July 6, 2007, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, knowingly did use a corporation, that is, the New Jersey Association of Parent Coordinators, Inc., a corporation of the State of New Jersey, for the furtherance of criminal objects, that is the crimes of Official Misconduct, in violation of N.J.S.A. 2C:30-2, Pattern of Official Misconduct, in violation of N.J.S.A. 2C:30-7, Theft by Deception, in violation of N.J.S.A. 2C:20-4a, Tampering with Public Records or Information, in violation of N.J.S.A. 2C:28-7, and Forgery, in violation of N.J.S.A. 2C:21-1, and did derive therefrom a benefit in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:21-9c, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.


Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:


Deputy, Foreperson

Dated: 12/13/10

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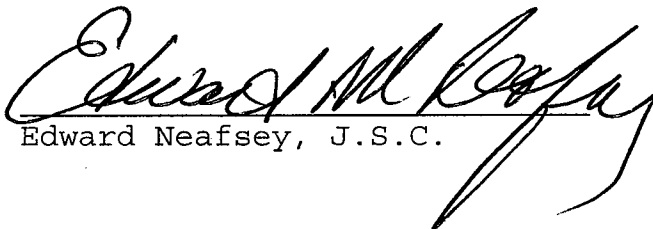
ANNA TALIAFERRO)

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 13 day of December 2010, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Passaic 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 Passaic for filing.


Edward Neafsey, J.S.C.