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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

Linda R. Feinberg, AJSC

State Grand Jury Judge

State Grand Jury

Number SGJ611-11-6

Superior Court

Docket Number 11-11-00156-S

STATE OF NEW JERSEY

v.

INDICTMENT

LAQUANDA MURRAY

JASON THOMAS

TYRONE CANADA

MARTIN A. MARTINEZ

ANTONIO VASQUEZ

VIRGINIA MARTINEZ

GUILLERMO PRIETO,
AKA "WILLIE"

ROGERIO DASILVA

GUSTAVO VALENCIA

and

DOMINGOS BONELA

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

COUNT ONE

(Conspiracy - Second Degree)

LAQUANDA MURRAY

JASON THOMAS

TYRONE CANADA

MARTIN A. MARTINEZ

ANTONIO VASQUEZ

VIRGINIA MARTINEZ

GUILLERMO PRIETO

ROGERIO DASILVA

GUSTAVO VALENCIA

and

DOMINGOS BONELA

who are named as defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about November 17, 2008, and on or about March 25, 2009, at the City of East Orange, in the County of Essex, at the Townships of Hillside and Union, both in the County of Union, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of official misconduct, computer crimes, and tampering with public records, did agree together and with a member of the New Jersey State Police working in an undercover capacity, that:

A. 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

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

1. Knowingly commit an act relating to the office of a public servant but constituting an unauthorized exercise of said public servant's official functions, knowing that such act was unauthorized or was being committed in an unauthorized manner, or knowingly to refrain from performing a duty which is imposed upon said public servant by law or which is clearly inherent in the nature of the public office, with purpose to obtain a benefit for the public servant or another, contrary to the provisions of N.J.S.A. 2C:30-2.

2. Purposely or knowingly and without authorization, or in excess of authorization, alter any data, data base, computer, computer storage medium, computer program, computer computer system, or computer network, contrary to the provisions of N.J.S.A. 2C:20-25(b).

3. With purpose to defraud the New Jersey Motor Vehicle Commission, knowingly make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, with purpose that it be taken as a genuine part of any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law

to be kept by others for information of the government, contrary to the provisions of N.J.S.A. 2C:28-7a(2).

The Grand Jurors aforesaid, upon their oaths, do further present that:

It was part of the said conspiracy that LAQUANDA MURRAY, a Customer Service Representative for the New Jersey Motor Vehicle Commission, issued New Jersey Motor Vehicle Commission driver's licenses to individuals who could not legitimately obtain and were not authorized to receive New Jersey Motor Vehicle Commission driver's licenses.

It was part of the said conspiracy that JASON THOMAS and TYRONE CANADA, both former employees of the New Jersey Motor Vehicle Commission, MARTIN A. MARTINEZ, ANTONIO VASQUEZ, VIRGINIA MARTINEZ, GUILLERMO PRIETO, ROGERIO DASILVA, GUSTAVO VALENCIA and DOMINGOS BONELA assisted individuals who could not legitimately obtain New Jersey Motor Vehicle Commission driver's licenses to obtain New Jersey Motor Vehicle Commission driver's licenses from LAQUANDA MURRAY.

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

COUNTS TWO THROUGH SEVENTEEN

(Official Misconduct - Second Degree)

LAQUANDA MURRAY

JASON THOMAS

TYRONE CANADA

MARTIN A. MARTINEZ

ANTONIO VASQUEZ

VIRGINIA MARTINEZ

GUILLERMO PRIETO

ROGERIO DASILVA

GUSTAVO VALENCIA

and

DOMINGOS BONELA

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that, the said LAQUANDA MURRAY, being a public servant, that is, a Customer Service Representative for the New Jersey Motor Vehicle Commission, East Orange Agency, and acting with purpose to obtain a benefit for herself or another or to injure or to deprive another of a benefit, did commit an act or acts relating to her office, but constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, or did knowingly refrain from performing a duty imposed

upon her by law or clearly inherent in the nature of her office, that is, the said LAQUANDA MURRAY, while employed by the New Jersey Motor Vehicle Commission, East Orange Agency, thereby performing a governmental function, having thereby the official functions and duties, among others, to verify that individuals applying for New Jersey driver's licenses are thereby authorized to receive said licenses, to process and issue New Jersey Motor Vehicle Commission driver's licenses, 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 assistance of JASON THOMAS, TYRONE CANADA, MARTIN A. MARTINEZ, ANTONIO VASQUEZ, VIRGINIA MARTINEZ, GUILLERMO PRIETO, ROGERIO DASILVA, GUSTAVO VALENCIA and DOMINGOS BONELA, with purpose to secure a benefit for themselves or another, process or issue New Jersey Motor Vehicle Commission driver's licenses, without obtaining or receiving the proper documentation for same, all as set forth herein:

Count	Defendant(s)	Date(s)	Customer	Municipality/ County
2	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ VIRGINIA MARTINEZ	11/17/2008	VIRGINIA MARTINEZ	City of East Orange, County of Essex
3	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	12/11/2008	Angel Ruano	City of East Orange, County of Essex

Count	Defendant (s)	Date (s)	Customer	Municipality/ County
4	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ ROGERIO DASILVA	12/18/2008	Grazielle Costa	City of East Orange, County of Essex
5	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	12/27/2008	Alvaro F. Telles	City of East Orange, County of Essex
6	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ ROGERIO DASILVA	12/29/2008	Elizabeth DeAssis	City of East Orange, County of Essex
7	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	1/10/2009	Antonio Gomes	City of East Orange, County of Essex
8	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	1/10/2009	Anderson Borges	City of East Orange, County of Essex
9	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUSTAVO VALENCIA	2/09/2009	Jose Vergara	City of East Orange, County of Essex
10	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	2/10/2009	Jose Roca	City of East Orange, County of Essex
11	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	2/23/2009	Raquel Guridi	City of East Orange, County of Essex
12	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ ROGERIO DASILVA	2/25/2009	Otto DeOliveira	City of East Orange, County of Essex
13	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	2/25/2009	Maria L. Alves	City of East Orange, County of Essex

Count	Defendant (s)	Date (s)	Customer	Municipality/ County
14	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ	3/11/2009	Haydee Uriza	City of East Orange, County of Essex
15	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ	3/11/2009	Bernardo Santiago	City of East Orange, County of Essex
16	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	3/25/2009	Luis Mendez	City of East Orange, County of Essex
17	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ ANTONIO VASQUEZ	3/25/2009	a member of the New Jersey Division of State Police working in an undercover capacity	City of East Orange, County of Essex, Township of Hillside and the Township of Union, both in the County of Union

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 the same.

COUNT EIGHTEEN

(Pattern of Official Misconduct - Second Degree)

LAQUANDA MURRAY

between on or about November 17, 2008, and on or about March 25, 2009, at the City of East Orange, in the County of Essex, 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 LAQUANDA MURRAY, then and there being a public servant, to wit: a Customer Service Representative with the New Jersey Motor Vehicle Commission, East Orange Agency, having thereby the official functions and duties, among others, to verify that individuals applying for New Jersey driver's licenses are thereby authorized to receive said licenses, to process and issue New Jersey Motor Vehicle Commission Digital driver's licenses, 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 described in Counts Two through Seventeen, which allegations are incorporated by reference as if fully set forth herein, contrary to the provisions of N.J.S.A. 2C:30-7 and

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

COUNTS NINETEEN THROUGH THIRTY-FOUR

(Computer Criminal Activity - Second Degree)

LAQUANDA MURRAY

JASON THOMAS

TYRONE CANADA

MARTIN A. MARTINEZ

ANTONIO VASQUEZ

VIRGINIA MARTINEZ

GUILLERMO PRIETO

ROGERIO DASILVA

GUSTAVO VALENCIA

and

DOMINGOS BONELA

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, purposely or knowingly and without authorization, or in excess of authorization, did alter the New Jersey Motor Vehicle Commission data base or other computer storage medium, that is, the said LAQUANDA MURRAY, being a Customer Service Representative for the New Jersey Motor Vehicle Commission, East Orange Agency, with the assistance of JASON THOMAS, TYRONE CANADA, MARTIN A. MARTINEZ, ANTONIO VASQUEZ, VIRGINIA MARTINEZ, GUILLERMO PRIETO, ROGERIO DASILVA, GUSTAVO VALENCIA and DOMINGOS BONELA, altered the New Jersey Motor Vehicle Commission Database or other computer storage medium by

entering false data that New Jersey Driver's licenses were properly issued to VIRGINIA MARTINEZ and others, all as set forth herein:

Count	Defendant (s)	Date (s)	Customer	Municipality/ County
19	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ VIGINIA MARTINEZ	11/17/2008	VIRGINIA MARTINEZ	City of East Orange, County of Essex
20	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	12/11/2008	Angel Ruano	City of East Orange, County of Essex
21	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ ROGERIO DASILVA	12/18/2008	Grazielle Costa	City of East Orange, County of Essex
22	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	12/27/2008	Alvaro F. Telles	City of East Orange, County of Essex
23	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ ROGERIO DASILVA	12/29/2008	Elizabeth DeAssis	City of East Orange, County of Essex
24	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	1/10/2009	Antonio Gomes	City of East Orange, County of Essex
25	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	1/10/2009	Anderson Borges	City of East Orange, County of Essex
26	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUSTAVO VALENCIA	2/09/2009	Jose Vergara	City of East Orange, County of Essex

Count	Defendant (s)	Date (s)	Customer	Municipality/ County
27	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	2/10/2009	Jose Roca	City of East Orange, County of Essex
28	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	2/23/2009	Raquel Guridi	City of East Orange, County of Essex
29	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ ROGERIO DASILVA	2/25/2009	Otto DeOliveira	City of East Orange, County of Essex
30	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	2/25/2009	Maria L. Alves	City of East Orange, County of Essex
31	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ	3/11/2009	Haydee Uriza	City of East Orange, County of Essex
32	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ	3/11/2009	Bernardo Santiago	City of East Orange, County of Essex
33	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	3/25/2009	Luis Mendez	City of East Orange, County of Essex
34	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ ANTONIO VASQUEZ	3/25/2009	a member of the New Jersey Division of State Police working in an undercover capacity	City of East Orange, County of Essex, Township of Hillside and the Township of Union, both in the County of Union

contrary to the provisions of N.J.S.A. 2C:20-25(b), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNTS THIRTY-FIVE THROUGH FIFTY

(Tampering with Public Records or Information - Third Degree)

LAQUANDA MURRAY

JASON THOMAS

TYRONE CANADA

MARTIN A. MARTINEZ

ANTONIO VASQUEZ

VIRGINIA MARTINEZ

GUILLERMO PRIETO

ROGERIO DASILVA

GUSTAVO VALENCIA

and

DOMINGOS BONELA


at the times set forth herein, elsewhere, and within the jurisdiction of this Court, with the purpose to defraud or injure another, knowingly did make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; that is, the said JASON THOMAS, TYRONE CANADA, MARTIN A. MARTINEZ, ANTONIO VASQUEZ, VIRGINIA MARTINEZ, GUILLERMO PRIETO, ROGERIO DASILVA, GUSTAVO VALENCIA and DOMINGOS BONELA, with the assistance of LAQUANDA MURRAY, did make or offer for filing or use a New Jersey Motor Vehicle Commission Application for a

Renewal of a New Jersey driver's license containing false information, which was submitted to the New Jersey Motor Vehicle Commission with the purpose that it be taken as a genuine part of the records kept by the State of New Jersey, New Jersey Motor Vehicle Commission, all as set forth herein:

Count	Defendant(s)	Date(s)	Customer	Municipality/ County
35	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ VIGINIA MARTINEZ	11/17/2008	VIRGINIA MARTINEZ	City of East Orange, County of Essex
36	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	12/11/2008	Angel Ruano	City of East Orange, County of Essex
37	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ ROGERIO DASILVA	12/18/2008	Grazielle Costa	City of East Orange, County of Essex
38	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	12/27/2008	Alvaro F. Telles	City of East Orange, County of Essex
39	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ ROGERIO DASILVA	12/29/2008	Elizabeth DeAssis	City of East Orange, County of Essex
40	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	1/10/2009	Antonio Gomes	City of East Orange, County of Essex
41	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	1/10/2009	Anderson Borges	City of East Orange, County of Essex
42	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUSTAVO VALENCIA	2/09/2009	Jose Vergara	City of East Orange, County of Essex

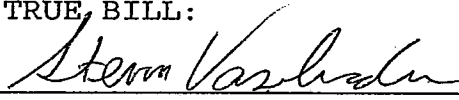
Count	Defendant (s)	Date (s)	Customer	Municipality/ County
43	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	2/10/2009	Jose Roca	City of East Orange, County of Essex
44	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	2/23/2009	Raquel Guridi	City of East Orange, County of Essex
45	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ ROGERIO DASILVA	2/25/2009	Otto DeOliveira	City of East Orange, County of Essex
46	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA ANTONIO VASQUEZ DOMINGOS BONELA	2/25/2009	Maria L. Alves	City of East Orange, County of Essex
47	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ	3/11/2009	Haydee Uriza	City of East Orange, County of Essex
48	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ	3/11/2009	Bernardo Santiago	City of East Orange, County of Essex
49	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ GUILLERMO PRIETO	3/25/2009	Luis Mendez	City of East Orange, County of Essex
50	LAQUANDA MURRAY JASON THOMAS TYRONE CANADA MARTIN A. MARTINEZ ANTONIO VASQUEZ	3/25/2009	a member of the New Jersey Division of State Police working in an undercover capacity	City of East Orange, County of Essex, Township of Hillside and the Township of Union, both in the County of Union

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



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 11/28/11

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NOV 28 2011

Linda R. Feinberg, AJSC

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

FILED

DEC 05 2011

State Grand Jury

Number SGJ611-11-6

Superior Court

Docket Number

11-11-00156

State Grand Jury Judge

STATE OF NEW JERSEY

v.

LAQUANDA MURRAY

JASON THOMAS

TYRONE CANADA

MARTIN A. MARTINEZ

ANTONIO VASQUEZ

VIRGINIA MARTINEZ

GUILLERMO PRIETO,
AKA "WILLIE"

ROGERIO DASILVA

GUSTAVO VALENCIA

and

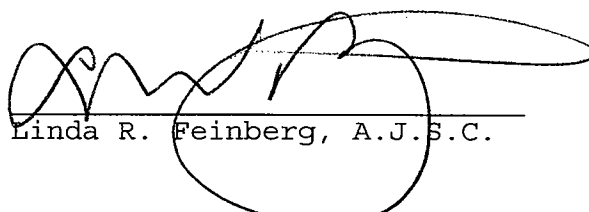
DOMINGOS BONELA

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 28th day of November, 2011, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Essex 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 Essex for filing.


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

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

IN THE MATTER OF)
STATE GRAND JURY INDICTMENT)
NUMBER SGJ611-11-6)
STATE OF NEW JERSEY)
v.)
LAQUANDA MURRAY)
JASON THOMAS)
TYRONE CANADA)
MARTIN A. MARTINEZ)
ANTONIO VASQUEZ)
VIRGINIA MARTINEZ)
GUILLERMO PRIETO,)
AKA "WILLIE")
ROGERIO DASILVA)
GUSTAVO VALENCIA)
and)
DOMINGOS BONELA)

FILED

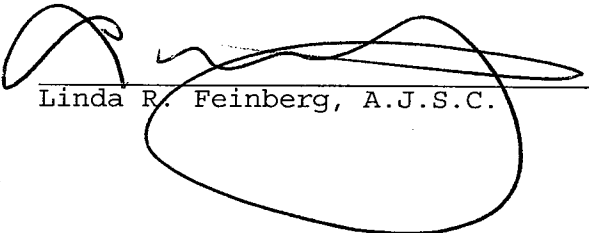
DEC 05 2011

State Grand Jury Judge

ORDER TO UNSEAL INDICTMENT

Andrew M. Butchko, Deputy Attorney General of the State of New Jersey, having on this date made written and oral application for an order to unseal State Grand Jury Indictment Number SGJ611-11-6, and to unseal the Order of Venue designating a county of venue for the purpose of trial of the said Indictment;

IT IS HEREBY ORDERED on this 5th day of December, 2011, that the Clerk of the Superior Court unseal and release State Grand Jury Indictment Number SGJ611-11-6 and the Order of Venue designating a county of venue for the purpose of the trial of the said Indictment.


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

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

IN THE MATTER OF)
STATE GRAND JURY INDICTMENT)
NUMBER SGJ611-11-6)

VERIFIED PETITION

FILED


DEC 05 2011

State Grand Jury Judge

STATE OF NEW JERSEY)
COUNTY OF MERCER) SS.

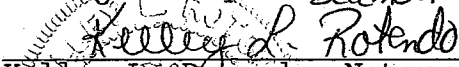
Andrew M. Butchko, of full age, being duly sworn according to law, upon his oath, respectfully petitions the Court as follows:

1. I am a Deputy Attorney General assigned to the Division of Criminal Justice.
2. On November 28, 2011 an Indictment in the above-captioned matter was returned to this Court. On that date the said Indictment and Order of Venue designating a county of venue for the purpose of trial were sealed by Order of this Court dated November 28, 2011.
3. The investigative reasons which supported the sealing of the Indictment and order described in paragraph 2, pursuant to R.3:6-8, no longer prevail.
4. Therefore, I respectfully petition this Court to order the above-captioned Indictment and Order of Venue be unsealed and released as public documents.



Andrew M. Butchko
Deputy Attorney General
Division of Criminal Justice

Sworn and subscribed to before me
this 5th day of December, 2011.



Kelley J. Rotondo, Notary Public NJ
My commission expires May 11, 2012
(ID #2200797)

