

NOV 15 2011

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

**FILED**

DEC 05 2011

**State Grand Jury Judge**

State Grand Jury

Number SGJ612-11-10

Superior Court

Docket Number 11-11-00149-S

V.

INDICTMENT

CARLOS R. RAMIREZ-YEPES

COUNT ONE

(Conspiracy - Second Degree)

GUSTAVO VALENCIA

MARTHA JALIL

RICARDO JALIL

DELMIS URQUIA

FREDY H. QUIROGA-COBOS

JAIME E. ESPINOZA

CONSTANTINO GRANDADOS-HERNANDEZ

JULIO C. RIOS-ELEJALDE

and

CARLOS R. RAMIREZ-YEPES

who are named as defendants herein, and other persons whose identities are both known and unknown to the Grand Jurors, who are co-conspirators but who are not named as defendants herein, between in or about June 2009, and on or about October 13, 2009, at the Township of Edison, in the County of Middlesex, at the Town of Dover, in the County of Morris, elsewhere, and within the jurisdiction of the Court, with the purpose of promoting or facilitating the commission of the crimes of bribery, official misconduct, computer theft, and tampering with public records or information, did agree together and with a member of the New Jersey Division of Criminal Justice working in an undercover capacity and a person whose identity is known to the Grand Jurors and who at all times relevant to this Indictment was acting as an agent of the New Jersey Division of Criminal Justice, that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes; or

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

1. Knowingly to directly or indirectly offer, confer or agree to confer upon another, or to solicit, accept or agree to accept from another, any benefit as consideration for a violation of an official duty of a public servant, or any benefit as consideration for the performance of an official duty of a public servant, contrary to the provisions of N.J.S.A. 2C:27-2.

2. Purposely or knowingly, without authorization or in excess of authorization, to alter the New Jersey Motor Vehicle Commission data base or other computer storage medium, contrary to the provisions of N.J.S.A. 2C:20-25.

3. Knowingly to 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.

4. With purpose to defraud the New Jersey Motor Vehicle Commission, to 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 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 a person whose identity is known to the Grand Jurors, who is named as a co-conspirator but not as a defendant herein, and who at all times relevant to this Indictment was a Customer Service Representative for the New Jersey Motor Vehicle Commission, did accept bribes in exchange for the improper issuance of New Jersey Motor Vehicle Commission driver's licenses.

It was part of the said conspiracy that GUSTAVO VALENCIA, MARTHA JALIL, RICARDO JALIL, and other persons whose identities are known to the Grand Jurors, who are named as co-conspirators but not as defendants herein, did assist individuals who could not legitimately obtain New Jersey Motor Vehicle Commission driver's licenses, accept money from those individuals, and arrange for these individuals to obtain New Jersey Motor Vehicle Commission driver's licenses, from said Customer Service Representative for the New Jersey Motor Vehicle Commission.

It was part of the said conspiracy that DELMIS URQUIA, FREDY H. QUIROGA-COBOS, JAIME E. ESPINOZA, CONSTANTINO GRANDADOS-HERNANDEZ, JULIO C. RIOS-ELEJALDE, CARLOS R. RAMIREZ-YEPES, a member of the New Jersey Division of Criminal Justice working in an undercover capacity, and a person whose identity is known to the Grand Jurors who at all times relevant to this Indictment was acting as an agent of the New Jersey Division of Criminal Justice, did give money to GUSTAVO VALENCIA, MARTHA JALIL, RICARDO JALIL, and the said Customer Service Representative for the New Jersey Motor Vehicle Commission, in exchange for the improper issuance of New Jersey Motor Vehicle Commission driver's licenses.

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.

COUNTS TWO THROUGH TEN

(Bribery in Official Matters - Second Degree)

GUSTAVO VALENCIA

MARTHA JALIL

RICARDO JALIL

DELMIS URQUIA

FREDY H. QUIROGA-COBOS

JAIME E. ESPINOZA

CONSTANTINO GRANDADOS-HERNANDEZ

JULIO C. RIOS-ELEJALDE

and

CARLOS R. RAMIREZ-YEPES

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer or agree to confer upon another, a benefit in excess of \$200.00, as consideration for the violation of an official duty of a public servant or for the performance of an official duty of a public servant, that is, the said GUSTAVO VALENCIA, MARTHA JALIL, RICARDO JALIL, DELMIS URQUIA, FREDY H. QUIROGA-COBOS, JAIME E. ESPINOZA, CONSTANTINO GRANDADOS-HERNANDEZ, JULIO C. RIOS-ELEJALDE, and CARLOS R. RAMIREZ-YEPES, conferred bribes in excess of \$200 to a person whose identity is known to the Grand Jurors, who at all times relevant to this Indictment was a Customer Service Representative for the New

Jersey Motor Vehicle Commission, Edison Agency, in exchange for the improper issuance of New Jersey Motor Vehicle Commission driver's licenses, all as set forth herein:

Count	Defendant (s)	Date(s)	Municipality/ County
2	GUSTAVO VALENCIA	11/02/2009	Town of Morristown, County of Morris and the Township of Edison, County of Middlesex
3	DELMIS URQUIA	10/13/2009	Township of Edison, County of Middlesex
4	FREDY H. QUIROGA-COBOS	10/10/2009	Township of Edison, County of Middlesex and the Town of Dover, County of Morris
5	JAIME E. ESPINOZA and MARTHA JALIL	10/10/2009	Township of Edison, County of Middlesex
6	CONSTANTINO GRANADOS-HERNANDEZ, and GUSTAVO VALENCIA	10/03/2009	Borough of Morris Plains, County of Morris and the Township of Edison, County of Middlesex
7	JULIO C. RIOS-ELEJALDE, and RICARDO JALIL	09/19/2009	Township of Edison, County of Middlesex
8	GUSTAVO VALENCIA	09/02/2009	Borough of Morris Plains, County of Morris and the Township of Edison, County of Middlesex
9	CARLOS A. RAMIREZ-YEPES, MARTHA JALIL, and RICARDO JALIL	08/29/2009	Township of Edison, County of Middlesex

Count	Defendant (s)	Date (s)	Municipality/ County
10	MARTHA JALIL	08/06/2009	Township of Edison, County of Middlesex and the Town of Dover, County of Morris

contrary to the provisions of N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN THROUGH NINETEEN

(Computer Theft - Second Degree)

GUSTAVO VALENCIA

MARTHA JALIL

RICARDO JALIL

DELMIS URQUIA

FREDY H. QUIROGA-COBOS

JAIME E. ESPINOZA

CONSTANTINO GRANDADOS-HERNANDEZ

JULIO C. RIOS-ELEJALDE

and

CARLOS R. RAMIREZ-YEPES

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, a person whose identity is known to the Grand Jurors who at all times relevant to this Indictment was a Customer Service Representative for the New Jersey Motor Vehicle Commission, Edison Agency, with the assistance of GUSTAVO VALENCIA, MARTHA JALIL, RICARDO JALIL, DELMIS URQUIA, FREDY H. QUIROGA-COBOS, JAIME E. ESPINOZA, CONSTANTINO GRANDADOS-HERNANDEZ, JULIO C. RIOS-ELEJALDE, and CARLOS R. RAMIREZ-YEPES, who acted as accomplices of the Customer

Service Representative, 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 DELMIS URQUIA, FREDY H. QUIROGA-COBOS, JAIME E. ESPINOZA, CONSTANTINO GRANDADOS-HERNANDEZ, JULIO C. RIOS-ELEJALDE, CARLOS R. RAMIREZ-YEPES, a member of the New Jersey Division of Criminal Justice working in an undercover capacity, and a person whose identity is known to the Grand Jurors who at all times relevant to this Indictment was acting as an agent of the New Jersey Division of Criminal Justice, all as set forth herein:

Count	Defendant (s)	Date (s)	Municipality/ County
11	GUSTAVO VALENCIA	11/02/2009	Town of Morristown, County of Morris, and the Township of Edison, County of Middlesex
12	DELMIS URQUIA	10/13/2009	Township of Edison, County of Middlesex
13	FREDY H. QUIROGA-COBOS	10/10/2009	Township of Edison, County of Middlesex, and the Town of Dover, County of Morris
14	JAIME E. ESPINOZA and MARTHA JALIL	10/10/2009	Township of Edison, County of Middlesex
15	CONSTANTINO GRANADOS-HERNANDEZ, and GUSTAVO VALENCIA	10/03/2009	Borough of Morris Plains, County of Morris, and the Township of Edison, County of Middlesex

Count	Defendant (s)	Date (s)	Municipality/ County
16	JULIO C. RIOS-ELEJALDE, and RICARDO JALIL	09/19/2009	Township of Edison, County of Middlesex
17	GUSTAVO VALENCIA	09/02/2009	Borough of Morris Plains, County of Morris, and the Township of Edison, County of Middlesex
18	CARLOS A. RAMIREZ-YEPES, MARTHA JALIL, and RICARDO JALIL	08/29/2009	Township of Edison, County of Middlesex
19	MARTHA JALIL	08/06/2009	Township of Edison, County of Middlesex, and the Town of Dover, County of Morris

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

COUNT TWENTY THROUGH TWENTY-EIGHT

(Official Misconduct - Second Degree)

GUSTAVO VALENCIA

MARTHA JALIL

RICARDO JALIL

DELMIS URQUIA

FREDY H. QUIROGA-COBOS

JAIME E. ESPINOZA

CONSTANTINO GRANDADOS-HERNANDEZ

JULIO C. RIOS-ELEJALDE

and

CARLOS R. RAMIREZ-YEPES

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 a person whose identity is known to the Grand Jurors, being a public servant, that is, a Customer Service Representative for the New Jersey Motor Vehicle Commission, Edison Agency, and acting with purpose to obtain a benefit for herself or another or to injure or to deprive another of a benefit, with the assistance of GUSTAVO VALENCIA, MARTHA JALIL, RICARDO JALIL, DELMIS URQUIA, FREDY H. QUIROGA-COBOS, JAIME E. ESPINOZA, CONSTANTINO GRANDADOS-HERNANDEZ, JULIO C. RIOS-ELEJALDE, and CARLOS R. RAMIREZ-YEPES, 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, said person, while employed as a Customer Service Representative by the New Jersey Motor Vehicle Commission, Edison 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 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, with purpose to secure a benefit for herself or another, process or issue New Jersey Motor Vehicle Commission driver's licenses, to GUSTAVO VALENCIA, MARTHA JALIL, RICARDO JALIL, DELMIS URQUIA, FREDY H. QUIROGA-COBOS, JAIME E. ESPINOZA, CONSTANTINO GRANDADOS-HERNANDEZ, JULIO C. RIOS-ELEJALDE, CARLOS R. RAMIREZ-YEPES, a member of the New Jersey Division of Criminal Justice working in an undercover capacity, and a person whose identity is known to the Grand Jurors who at all times relevant to this Indictment was acting as an agent of the New Jersey Division of Criminal Justice, without obtaining or

receiving the proper documentation for same, for the benefit of herself and others, all as set forth herein:

Count	Defendant(s)	Date(s)	Municipality/ County
20	GUSTAVO VALENCIA	11/02/2009	Town of Morristown, County of Morris, and the Township of Edison, County of Middlesex
21	DELMIS URQUIA	10/13/2009	Township of Edison, County of Middlesex
22	FREDY H. QUIROGA-COBOS	10/10/2009	Township of Edison, County of Middlesex, and the Town of Dover, County of Morris
23	JAIME E. ESPINOZA and MARTHA JALIL	10/10/2009	Township of Edison, County of Middlesex
24	CONSTANTINO GRANADOS-HERNANDEZ, and GUSTAVO VALENCIA	10/03/2009	Borough of Morris Plains, County of Morris, and the Township of Edison, County of Middlesex
25	JULIO C. RIOS-ELEJALDE, and RICARDO JALIL	09/19/2009	Township of Edison, County of Middlesex
26	GUSTAVO VALENCIA	09/02/2009	Borough of Morris Plains, County of Morris, and the Township of Edison, County of Middlesex
27	CARLOS A. RAMIREZ-YEPES, MARTHA JALIL, and RICARDO JALIL	08/29/2009	Township of Edison, County of Middlesex
28	MARTHA JALIL	08/06/2009	Township of Edison, County of Middlesex, and the Town of Dover, County of Morris

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 TWENTY-NINE THROUGH THIRTY-SEVEN

(Tampering With Public Records or Information - Third Degree)

GUSTAVO VALENCIA

MARTHA JALIL

RICARDO JALIL

DELMIS URQUIA

FREDY H. QUIROGA-COBOS

JAIME E. ESPINOZA

CONSTANTINO GRANDADOS-HERNANDEZ

JULIO C. RIOS-ELEJALDE

and

CARLOS R. RAMIREZ-YEPES

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, with the purpose to defraud or injure the New Jersey Motor Vehicle Commission, knowingly did make, present, offer for filing, or use any record, document or thing knowing it to be false, and with the purpose that it be taken as a genuine part of the information or records 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, that is, DELMIS URQUIA, FREDY H. QUIROGA-COBOS, JAIME E. ESPINOZA, CONSTANTINO GRANDADOS-HERNANDEZ, JULIO C. RIOS-ELEJALDE, and CARLOS R. RAMIREZ-YEPES, with the assistance of GUSTAVO VALENCIA, MARTHA JALIL, and

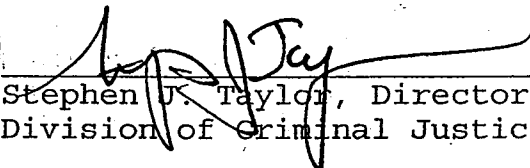
RICARDO JALIL, did make, present, offer for filing, or use, New Jersey Motor Vehicle Commission applications for New Jersey Motor Vehicle Commission driver's licenses, knowing that information contained in the applications was false, and with the purpose that it be taken as a genuine part of the information or records 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, all as set forth herein:

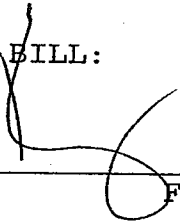
Count	Defendant (s)	Date(s)	Municipality/ County
29	GUSTAVO VALENCIA	11/02/2009	Town of Morristown, County of Morris, and the Township of Edison, County of Middlesex
30	DELMIS URQUIA	10/13/2009	Township of Edison, County of Middlesex
31	FREDY H. QUIROGA-COBOS	10/10/2009	Township of Edison, County of Middlesex, and the Town of Dover, County of Morris
32	JAIME E. ESPINOZA and MARTHA JALIL	10/10/2009	Township of Edison, County of Middlesex
33	CONSTANTINO GRANADOS-HERNANDEZ, and GUSTAVO VALENCIA	10/03/2009	Borough of Morris Plains, County of Morris, and the Township of Edison, County of Middlesex
34	JULIO C. RIOS-ELEJALDE, and RICARDO JALIL	09/19/2009	Township of Edison, County of Middlesex

Count	Defendant (s)	Date (s)	Municipality/ County
35	GUSTAVO VALENCIA	09/02/2009	Borough of Morris Plains, County of Morris, and the Township of Edison, County of Middlesex
36	CARLOS A. RAMIREZ-YEPES, MARTHA JALIL, and RICARDO JALIL	08/29/2009	Township of Edison, County of Middlesex
37	MARTHA JALIL	08/06/2009	Township of Edison, County of Middlesex, and the Town of Dover, County of Morris

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.

A TRUE BILL:

  
 Stephen J. Taylor, Director  
 Division of Criminal Justice

  
 Foreperson

Dated: 11-15-11

**FILED**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

DEC 05 2011

State Grand Jury

Number SGJ612-11-10

State Grand Jury Judge

Superior Court

Docket Number 11-11-00149-S

**RECEIVED**

NOV 15 2011

Linda R. Feinberg, AJ3C

STATE OF NEW JERSEY )

v. )

GUSTAVO VALENCIA )

MARTHA JALIL )

RICARDO JALIL )

ORDER OF VENUE

DELMIS URQUIA )

FREDY H. QUIROGA-COBOS )

JAIME E. ESPINOZA )

CONSTANTINO GRANDADOS-  
HERNANDEZ )

JULIO C. RIOS-ELEJALDE )

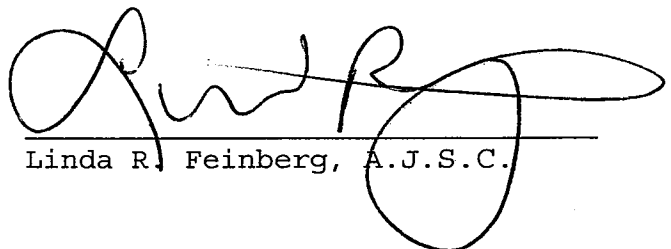
and )

CARLOS R. RAMIREZ-YEPES )

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

IT IS ORDERED on this 15th day of November, 2011, 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.

**FILED**

DEC 05 2011

**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

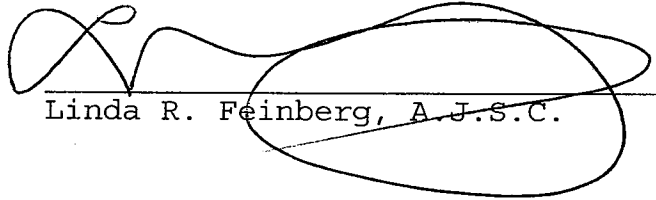
IN THE MATTER OF )  
STATE GRAND JURY INDICTMENT )  
NUMBER SGJ612-11-10 )  
STATE OF NEW JERSEY )  
v. )  
GUSTAVO VALENCIA )  
MARTHA JALIL )  
RICARDO JALIL )  
DELMIS URQUIA )  
FREDY H. QUIROGA-COBOS )  
JAIME E. ESPINOZA )  
CONSTANTINO GRANDADOS- )  
HERNANDEZ )  
JULIO C. RIOS-ELEJALDE )  
and )  
CARLOS R. RAMIREZ-YEPES )

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 SGJ612-11-10, 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 5<sup>th</sup> day of December 2011, that the Clerk of the Superior Court unseal and release State

Grand Jury Indictment Number SGJ612-11-10 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.

FILED

DEC 05 2011

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

IN THE MATTER OF )  
STATE GRAND JURY INDICTMENT )  
NUMBER SGJ612-11-10 )

VERIFIED PETITION

STATE OF NEW JERSEY )  
COUNTY OF MERCER ) SS.


Andrew M. Butchko, 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.

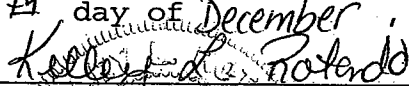
2. On November 15, 2011, an Indictment in the above-captioned matter was returned to this Court. On that date the said Indictment and Order of Venue designating a county of venue for the purpose of trial were sealed by Order of this Court dated November 15, 2011.

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 5<sup>th</sup> day of December, 2011.

  
Kelley L. Rotondo, Notary Public NJ  
My commission expires May 11, 2012  
(ID #2290797)

