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DEC 16 2019

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ741-19-10
Superior Court
Docket Number 19-12-00166-\$

STATE OF NEW JERSEY	)	
V.,	)	INDICTMENT
RONALD J. DIMURA	)	

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

## COUNT ONE

(Theft By Unlawful Taking - Second Degree)

#### RONALD J. DIMURA

between in or about January 2013 and in or about June 2019, in the Borough of Middlesex, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise unlawful control over the movable property of one or more political campaign funds, political party funds or political committee funds identified to the Grand Jury, that is funds in excess of \$75,000, to wit: approximately \$190,0000, with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3, against the peace of this State and the government and dignity of same.

## COUNT TWO

(Misapplication of Entrusted Property and Property of Government - Second Degree)

## RONALD J. DIMURA

between in or about January 2013 and in or about June 2019, at the Borough of Middlesex, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly did apply or dispose of property entrusted to him as a fiduciary, or property belonging to or required to be withheld for the benefit of the government, that is, funds under his control as the Treasurer of various political campaigns for office in the Borough of Middlesex, political party funds or political committee funds, in a manner which the said RONALD J. DIMURA knew was unlawful and involved substantial risk of loss or detriment to the owner of the property or to a person or entity for whose benefit the property was entrusted, thereby deriving a benefit of \$75,000 or more for himself or another, contrary to the provisions of  $\underline{\text{N.J.S.A.}}$  2C:21-15, and against the peace of this State, the government and dignity of same.

## COUNT THREE

(Financial Facilitation of Criminal Activity - Second Degree)

RONALD J. DIMURA

between in or about January 2013 and in or about June 2019, at the Borough of Middlesex, in the County of Middlesex, 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 RONALD J. DIMURA knew or which a reasonable person would believe to be derived from criminal activity, to wit: Theft By Unlawful Taking, knowing that the transaction was 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 RONALD J. DIMURA did transfer funds stolen from various political campaigns for office in Middlesex Borough, political party funds or political committee funds into the bank account of a charitable organization, or then did subsequently transferred a portion of those funds, in an amount of \$75,000 or more, to the account of the said RONALD J. DIMURA's sole proprietorship, in order to conceal their source before using them for their true intended destination to wit: deposits into the personal bank account of the said RONALD J. DIMURA or payments for the personal expenses of the said RONALD J. DIMURA, knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to provisions of N.J.S.A. 2C:21-25(b)(2)(a) and against the peace of this State, the government and dignity of same.

## COUNT FOUR

(Official Misconduct - Second Degree)

RONALD J. DIMURA

between in or about April 2017 and in or about April 2019, at the Borough of Middlesex, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that said RONALD J. DIMURA, acting with the purpose to obtain a benefit for himself or another or to injure or deprive another of a benefit, did commit one or more 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 or did refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, that is, the said RONALD J. DIMURA, then and there being a public servant, to wit: the Mayor of the Borough of Middlesex, and having thereby the official functions and duties, among others, to refrain from using or attempting to use his official position to secure unwarranted privileges or advantages for himself or others, to refrain from acting in an official capacity in any matter wherein he had a direct or indirect personal financial interest that might reasonably be expected to impair objectivity or independence of judgment, 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 use his position as Mayor of Middlesex Borough to solicit funds from a party with pending business before the Borough Council and Planning Board ostensibly for a charitable organization, when in truth and in fact the funds were solicited and used for the personal benefit of the said RONALD J. DIMURA, all with the purpose of obtaining a benefit for himself or another, or to injure or deprive another of a benefit, contrary to the provisions of N.J.S.A. 2C:30-2, and against the peace of this State, the government and dignity of same.

## COUNT FIVE

(Theft By Deception - Third Degree)

## RONALD J. DIMURA

between in or about May 2017 and in or about May 2019, in the Borough of Middlesex, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely did obtain funds in excess of \$500, to wit: approximately \$10,000, from one or more limited liability corporations controlled by M.P., an individual whose identity is known to the grand jurors, by deception, that is by creating or reinforcing the false impression that the funds were being donated to a charitable organization, when in truth and in fact, the funds were to be used for the personal benefit of the said RONALD J. DIMURA, or for the benefit of a sole proprietorship owned by the said RONALD J. DIMURA, contrary to the provisions of N.J.S.A. 2C:20-4, against the peace of this State and the government and dignity of the same.

## COUNT SIX

(Theft By Deception - Second Degree)

### RONALD J. DIMURA

between in or about April 2014 and in or about July 2019, in the Borough of Middlesex, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely did obtain funds in excess of \$75,000, from one or more individuals, whose identities are known to the grand jurors, by deception, that is by creating or reinforcing the false impression that they were loaning the said RONALD J. DIMURA funds to be invested on their behalf for which they would garner earnings and be repaid, when in truth and in fact, the funds were to be used for the personal benefit of the said RONALD J. DIMURA, or for the benefit of a sole proprietorship owned by the said RONALD J. DIMURA, contrary to the provisions of N.J.S.A. 2C:20-4, against the peace of this State and the government and dignity of the same.

### COUNT SEVEN

(Official Misconduct - Second Degree)

RONALD J. DIMURA

between in or about April 2017 and in or about April 2019, at the Borough of Middlesex, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that said RONALD J. DIMURA, acting with the purpose to obtain a benefit for himself or another or to injure or deprive another of a benefit, did commit one or more 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 or did refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, that is, the said RONALD J. DIMURA, then and there being a public servant, to wit: the Mayor of the Borough of Middlesex, and having thereby the official functions and duties, among others, to refrain from using or attempting to use his official position to secure unwarranted privileges or advantages for himself or others, to refrain from acting in an official capacity in any matter wherein he had a direct or indirect personal financial interest that might reasonably be expected to impair objectivity or independence of judgment, 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 file one or more Local Government Ethics Law Financial Disclosure Statements with the New Jersey Department of Community Affairs, Division of Local Government Services, Local Finance Board that he knew to be false or incomplete as to his income or any gifts, reimbursements or prepaid expenses received by him, with the purpose of obtaining a benefit for himself or another, or to injure or deprive another of a benefit, contrary to the provisions of N.J.S.A. 2C:30-2, and against the peace of this State, the government and dignity of same.

#### COUNT EIGHT

(Pattern of Official Misconduct - Second Degree)

RONALD J. DIMURA

in or about April 2017 and in or about April 2019, at the Borough of Middlesex, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did commit the offense of Pattern of Official Misconduct in that the said RONALD J. DIMURA, did commit two or more acts of Official Misconduct, each in violation of N.J.S.A. 2C:30-2, that is, the said RONALD J. DIMURA, being a public servant, to wit: the Mayor of the Borough of Middlesex, and having thereby the official functions and duties, among others, to refrain from using or attempting to use his official position to secure unwarranted privileges or advantages for himself or others, to refrain from acting in an official capacity in any matter wherein he had a direct or indirect personal financial interest that might reasonably be expected to impair objectivity or independence of judgment, 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 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 Four and Seven, which allegations are incorporated by reference as if fully set forth herein, contrary to the provisions of

 $\underline{\text{N.J.S.A.}}$  2C:30-7, and against the peace of this State, the government and dignity of same.

### COUNT NINE

(Tampering with Public Records - Third Degree)

RONALD J. DIMURA

between in or about May 2014 and in or about April 2019, in the Borough of Middlesex, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did 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, or made, presented, offered for filing or used any record, document, or thing knowing it to be false, and with the purpose that it be taken as a genuine part of information or records 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 Local Government Ethics Law Financial Disclosure Statements filed with the New Jersey Department of Community Affairs, Division of Local Government Services, Local Finance Board, contrary to the

provisions of  $\underline{\text{N.J.S.A.}}$  2C:28-7, and against the peace of this State, the government and dignity of same.

Thomas Elener, Director
Division of Criminal Justice
Office of Public Integrity &
Accountability

A TRUE BILL:

Foreperson

Dated: 12/16/19

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ741-19-10
Superior Court
Docket Number 19-12-00 166-\$

STATE OF NEW JERSEY )

v. ) ORDER OF VENUE

RONALD J. DIMURA )

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

IT IS ORDERED on this 1644 day of December, 2019, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Middlesex 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 Middlesex for filing.

Mary C. Jacobson, A.J.S.C.