

**FILED**  
**JANUARY 27, 2021**  
**STATE GRAND JURY JUDGE**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ750-21-5  
Superior Court  
Docket Number 21-1-8-S

STATE OF NEW JERSEY            )  
  
v.                                        )  
  
JOHN CESARO                        )

INDICTMENT

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

COUNT ONE

(Official Misconduct - Second Degree)

JOHN CESARO

between on or about April 20, 2018 and on or about May 19, 2018, at the Township of Randolph, at the City of Morristown, at the Borough of Mountain Lakes, all in the County of Morris, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said JOHN CESARO, being a public servant and acting with the purpose to obtain a benefit for himself or another in excess of \$200 or to injure or deprive another of a benefit in excess of \$200, did commit an act relating to his office, but constituting an unauthorized exercise of his official functions, knowing that

such act was unauthorized or that he was committing it 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 JOHN CESARO, then and there being a public servant, to wit: a Morris County Freeholder, having thereby the official functions and duties of said position, including among others, to refrain from soliciting or accepting any gift or thing of value given with the intent to influence him in the discharge of his official duties, to refrain from directly or indirectly, knowingly soliciting, accepting or agreeing to accept any benefit from another for any official act to be performed, 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 solicit or accept an unlawful payment of funds or did agree to provide public work or public contracts in exchange for funds, 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 against the peace of this State, the government and dignity of the same.

COUNT TWO

(Bribery in Official and Political Matters - Second Degree)

JOHN CESARO

between on or about April 20, 2018 and on or about May 19, 2018, at the Township of Randolph, at the City of Morristown, at the Borough of Mountain Lakes, all in the County of Morris, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly solicit, accept, or agree to accept from another a benefit that is, funds in excess of \$200, as consideration for the performance of official duties or the violation of official duties, that is, the said JOHN CESARO did solicit, accept or agree to accept approximately \$7,700 in United States currency from another, whose identity is known to the grand jurors (Person #1), as consideration for agreeing to use his official position as Morris County Freeholder to provide public contracts or work for Person #1 within Morris County, contrary to the provisions of N.J.S.A. 2C:27-2, and against the peace of this state, the government, and dignity of the same.

COUNT THREE

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

JOHN CESARO

between on or about April 20, 2018 and on or about May 19, 2018,  
at the Township of Randolph, at the City of Morristown, at the  
Borough of Mountain Lakes, elsewhere, and within the jurisdiction  
of this Court, did commit the offense of Acceptance or Receipt of  
Unlawful Benefit by Public Servant for Official Behavior, in that  
the said JOHN CESARO, being a public servant, that is, Morris  
County Freeholder, under color of his office and in connection  
with an official act performed or to be performed by him, did  
directly or indirectly, knowingly did 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 an official duty, to  
wit: to use his official position as Morris County Freeholder to  
provide public contracts or work for Person #1 within the said  
County of Morris, contrary to the provisions of N.J.S.A. 2C:27-  
10(a), and against the peace of this state, the government, and  
dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

JOHN CESARO

on or about June 25, 2018, at the Township of Parsippany, in the County of Morris, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure anyone, did 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 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, the said JOHN CESARO did file a Report of Campaign Contributions and Expenditures with the New Jersey Election Law Enforcement Commission, with purpose that the report be taken as a genuine part of information or records belonging to, or received or kept by, the government for information or record, knowing that the report contained false information regarding the identities of campaign contributors, contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Falsifying or Tampering with Records - Fourth Degree)

JOHN CESARO

on or about June 25, 2018, at the Township of Parsippany, in the County of Morris, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure anyone or to conceal any wrongdoing; that is, the said JOHN CESARO, with purpose to deceive the New Jersey Law Election Enforcement Commission, did file a Report of Campaign Contributions and Expenditures knowing that the report contained false information regarding the identities of campaign contributors, contrary to the provisions of N.J.S.A. 2C:21-4(a), and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Concealment or Misrepresentation of Contributions or  
Expenditures - Fourth Degree)

JOHN CESARO

on or about June 25, 2018, at the Township of Parsippany, in the County of Morris, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did purposely file or prepare or assist in the preparation for filing of any report required under New Jersey Election Law which he knew was false, inaccurate or incomplete in any material particular; that is, the said JOHN CESARO did purposely file or prepare or assist in the preparation for filing of a required Report of Campaign Contributions and Expenditures with the New Jersey Election Law Enforcement Commission, knowing that the report contained false information regarding the identities of campaign contributors, contrary to the provisions of N.J.S.A. 19:44A-21b; and against the peace of this State, the government and dignity of the same.



\_\_\_\_\_  
Thomas Eicher, Director  
Office of Public Integrity &  
Accountability

A TRUE BILL:

\_\_\_\_\_, Foreperson  
Dated: 1/27/2021