FILED

March 25, 2021 STATE GRAND JURY JUDGE SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ753-21-1
Superior Court
Docket Number 21-3-00031-S

STATE OF NEW JERSEY)	
V.)	INDICTMENT
MICHAEL PATTERSON)	

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

COUNT ONE

(Official Misconduct - Second Degree)

MICHAEL PATTERSON

on or about January 28, 2020, in the Township of Woodbridge, in the County of Middlesex, elsewhere and within the jurisdiction of this Court, did commit the offense of Official Misconduct, in that said MICHAEL PATTERSON, 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 knowingly refrain from performing one or more duties imposed upon him by law or clearly

inherent in the nature of his office, that is: the said MICHAEL PATTERSON, then and there being a public servant, to wit: a Trooper with the New Jersey State Police, and having thereby the official functions and duties, among others: (1) to only stop vehicles based on at least reasonable articulable suspicion that a motor vehicle statute, regulation, or criminal law has been violated, other than as permitted based on valid checkpoints or under other legal and procedural exceptions; (2) to not engage in questioning about matters wholly unrelated to the purpose of a routine traffic stop or the motorist's ability to safely and legally operate the vehicle if such questioning will extend the duration of the stop; (3) to ensure that the in-vehicle video recording system is positioned and adjusted to properly record the required activity; (4) to record all motor vehicle stops, criminal enforcement stops, motorist aids, motor vehicle accidents, and pedestrian contacts in their entirety when using the in-vehicle recording system equipped patrol vehicles; (5) to perform his duties in a legal and proper manner, (6) to display good faith, honesty and integrity, and (7) to be impervious to corrupting influences, did: (1) use his position or authority as a Trooper with the New Jersey State Police to detain Victim #1, an individual whose identity is known to the grand jurors, via a motor vehicle stop for the unauthorized purpose of making personal or romantic advances towards her, or reposition the Digital In-Vehicle Recorder camera in his troop car

in order that it would not capture the motor vehicle stop of Victim #1, with the purpose of securing a non-pecuniary benefit to himself, contrary to the provisions of N.J.S.A. 2C:30-2(a), and against the peace of this State, the government and dignity of same.

COUNT TWO

(Tampering with Public Records - Fourth Degree)

MICHAEL PATTERSON

on or about January 28, 2020, in the Township of Woodbridge, in the County of Middlesex, elsewhere and within the jurisdiction of this Court, with purpose to unlawfully alter, destroy, conceal, remove or disable any camera or other monitoring device including any videotape, film or other medium used to record sound or images that is installed in a patrol vehicle, the said MICHAEL PATTERSON, did purposely conceal or disable his Troop Car's Digital In-Vehicle Recorder camera from recording or capturing video images of a motor vehicle stop, contrary to the provisions of N.J.S.A. 2C:28-7c and against the peace of this State, the government and dignity of same.

COUNT THREE

(Stalking - Fourth Degree)

MICHAEL PATTERSON

on or about January 28, 2020, in the Township of Woodbridge, in

the County of Middlesex, elsewhere and within the jurisdiction of

this Court did commit the crime of Stalking, by purposely or

knowingly engaging in a course of conduct directed at a specific

person, Victim #1, an individual whose identity is known to the

grand jurors, that would cause a reasonable person to fear for her

safety or the safety of a third person or suffer other emotional

distress, that is the said MICHAEL PATTERSON, did purposefully

conduct a motor vehicle stop of Victim #1 for the purpose of making

personal or romantic advances towards her and did follow Victim #1

from the motor vehicle stop to her home, contrary to the

provisions of N.J.S.A. 2C:12-10(b), and against the peace of this

State, the government and dignity of the same.

Thomas Eicher, Director

Office of Public Integrity and

Accountability

A TRUE BILL:

Foreperson

Dated: 3/25/2021

5