

FILED

APR 22 2009

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ568-09-23

Superior Court

Docket Number 09-04-00071-S

STATE OF NEW JERSEY)

v.)

WESLEY STARR)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of official misconduct, bribery, tampering with public records or information and forgery, did agree together 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. Official misconduct, in that one or more of them with the purpose to obtain a benefit for himself or another would commit an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, contrary to the provisions of N.J.S.A. 2C:30-2;
 2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2; and
 3. Tampering with Public Records or Information, in that one or more of them, with the purpose to defraud or injure another, would 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, contrary to the provisions of N.J.S.A. 2C:28-7a(2); and

4. Forgery, in that one or more of them, with the purpose to defraud or injure anyone, or with knowledge that one is facilitating a fraud or injury to be perpetrated by anyone, makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act or of a fictitious person, or utters any writing which one knows to be forged, in violation of N.J.S.A. 2C:21-1a.

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.

COUNT TWO

(Official Misconduct - Second Degree)

WESLEY STARR

between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said WESLEY STARR, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit 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 a duty imposed upon him by law or clearly inherent in the nature of his office, and the said WESLEY STARR, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from John H. Bennett for the improper issuance of New Jersey Motor Vehicle

Commission Motor Vehicle Titles to John H. Bennett in the names of several individuals and/or businesses, whose identities are known to the Grand Jurors, and/or John H. Bennett did receive a benefit of monies in excess of \$200 for these titles, 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 same.

COUNT THREE

(Official Misconduct - Second Degree)

WESLEY STARR

between on or about August 6, 2007, and on or about October 12, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said WESLEY STARR, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit 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 a duty imposed upon him by law or clearly inherent in the nature of his office, and the said WESLEY STARR, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from Rafael Gomez for the improper issuance of a New Jersey Motor Vehicle

Commission Motor Vehicle Title to Rafael Gomez in Rafael Gomez's own name, 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 same.

COUNT FOUR

(Official Misconduct - Second Degree)

WESLEY STARR

between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said WESLEY STARR, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit 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 a duty imposed upon him by law or clearly inherent in the nature of his office, and the said WESLEY STARR, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from Thaer A. Abuhamood for the improper issuance of New Jersey Motor Vehicle

Commission Motor Vehicle Titles to Thaer A. Abuhamood in the names of individuals and/or a business, whose identities are known to the Grand Jurors, and/or Thaer A. Abuhamood did receive a benefit of monies in excess of \$200 for these titles, 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 same.

COUNT FIVE

(Official Misconduct - Second Degree)

WESLEY STARR

between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said WESLEY STARR, acting with purpose to obtain a benefit for himself or another or to injure or to deprive another of a benefit, did commit 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 a duty imposed upon him by law or clearly inherent in the nature of his office, and the said WESLEY STARR, then and there being a public servant, to wit: Support Service Representative 3 (SSR3) for the New Jersey Motor Vehicle Commission, Trenton Agency, having thereby the official functions and duties, among others, to process and issue New Jersey Motor Vehicle Commission Motor Vehicle Titles, and other New Jersey Motor Vehicle Commission documents, 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, with purpose to secure a benefit for himself or another, accept monies in excess of \$200 from Corey Tucker for the improper issuance of New Jersey Motor Vehicle

Commission Motor Vehicle Titles to Corey Tucker in the names of individuals and/or a business, whose identities are known to the Grand Jurors, and/or Corey Tucker did receive a benefit of monies in excess of \$200 for these titles, 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 same.

COUNT SIX

(Bribery - Second Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said WESLEY STARR, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from John H. Bennett, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to John H. Bennett in the names of several individuals and/or businesses, whose identities are known to the Grand Jurors, 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 the State, the government and the dignity of the same.

COUNT SEVEN

(Bribery - Second Degree)

WESLEY STARR

who is named as defendant herein, and another person, who is a coconspirator but who is not named as defendant herein, between on or about August 6, 2007, and on or about October 12, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said WESLEY STARR, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said Rafael Gomez, as consideration for the improper issuance of a New Jersey Motor Vehicle Commission Motor Vehicle Title to Rafael Gomez in Rafael Gomez's own name, 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 the State, the government and the dignity of the same.

COUNT EIGHT

(Bribery - Second Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said WESLEY STARR, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said Thaer A. Abuhamood, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to Thaer A. Abuhamood in the names of individuals and/or a business, whose identities are known to the Grand Jurors, 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 the State, the government and the dignity of the same.

COUNT NINE

(Bribery - Second Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein; between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said WESLEY STARR, while employed as a Support Service Representative 3 (SSR3) at the New Jersey Motor Vehicle Commission, Trenton Agency, did accept monies in excess of \$200 offered or conferred either directly or indirectly from the said Corey Tucker, as consideration for the improper issuance of New Jersey Motor Vehicle Commission Motor Vehicle Titles to Corey Tucker in the names of individuals and/or a business, whose identities are known to the Grand Jurors, 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 the State, the government and the dignity of the same.

COUNT TEN

(Tampering with Public Records or Information - Third Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about January 1, 2006, and on or about November 14, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, 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; that is, the said WESLEY STARR with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use New Jersey Motor Vehicle Commission Applications for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from the Trenton Police Department, whose identity is known to the Grand Jurors, which were 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, 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.

COUNT ELEVEN

(Tampering with Public Records or Information - Third Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about May 15, 2006, and on or about October 3, 2006, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, 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; that is, the said WESLEY STARR with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use New Jersey Motor Vehicle Commission Applications for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from the Trenton Police Department, whose identity is known to the Grand Jurors, which were 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, 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.

COUNT TWELVE

(Tampering with Public Records or Information - Third Degree)

WESLEY STARR

who is named as defendant herein, and other persons, who are coconspirators but who are not named as defendants herein, between on or about March 29, 2006, and on or about January 29, 2007, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure another, 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; that is, the said WESLEY STARR with the purpose to defraud the New Jersey Motor Vehicle Commission, did make or offer for filing or use New Jersey Motor Vehicle Commission Applications for Certificate of Ownership for Abandoned Vehicle containing false information concerning the vehicle being abandoned and the identity and pedigree information of the purported applicant, a law enforcement officer from Atlantic City Police Department, whose identity is known to the Grand Jurors, which were 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, 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