

**FILED**

JUL 16 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number: SGJ637-13-16

Superior Court 3-07-00128-S

Docket Number: \_\_\_\_\_

STATE OF NEW JERSEY )

v. )

JUAN R. STEVENS )

INDICTMENT

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

COUNT ONE

{Official Misconduct - Second Degree)

JUAN R. STEVENS

on or about May 23, 2011, in the Township of Mansfield,  
County of Burlington, and within the jurisdiction of this  
Court, did commit the offense of Official Misconduct, in  
that JUAN R. STEVENS, a public servant, acting with the  
purpose to obtain a nonpecuniary benefit for himself, did  
commit one or more acts relating to his office, but  
constituting an unauthorized exercise 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 on him by law or clearly inherent in the nature of his office, that is, the said JUAN R. STEVENS, then and there being a public servant, to wit: a Senior Corrections Officer with the New Jersey Department of Corrections, and having thereby the official functions and duties of said position, including among others, to refrain from violating the laws, statutes, and ordinances of the United States or of any state of the United States, to refrain from acting or behaving, either in an official or private capacity, to his discredit or to the discredit of the New Jersey Department of Corrections, to observe and behave in a manner consistent with the law enforcement higher standard both on and off-duty, to refrain from using New Jersey Department of Corrections property or equipment assigned to him in an unauthorized manner, to refrain from using or attempting to use his official position to secure unwarranted privileges or advantages for himself, 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 knowingly identify himself as a member of law enforcement and use his state-issued identification badge to commit an act of sexual assault, criminal restraint, criminal coercion, theft by extortion, or impersonation of

a law enforcement officer upon L.P., with the purpose to  
secure a nonpecuniary benefit to himself, 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

(Official Misconduct - Second Degree)

JUAN R. STEVENS

in or about January 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, did commit the offense of Official Misconduct, in that JUAN R. STEVENS, a public servant, acting with the purpose to obtain a nonpecuniary benefit for himself, did commit one or more acts relating to his office, but constituting an unauthorized exercise 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 on him by law or clearly inherent in the nature of his office, that is, the said JUAN R. STEVENS, then and there being a public servant, to wit: a Senior Corrections Officer with the New Jersey Department of Corrections, and having thereby the official functions and duties of said position, including among others, to refrain from violating the laws, statutes, and ordinances of the United States or of any state of the United States, to refrain from acting or behaving, either in an official or private capacity, to his discredit or to the discredit of the New Jersey Department of Corrections, to observe and behave in a manner consistent with the law

enforcement higher standard both on and off-duty, to refrain from using New Jersey Department of Corrections property or equipment assigned to him in an unauthorized manner, to refrain from using or attempting to use his official position to secure unwarranted privileges or advantages for himself, 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 knowingly identify himself as a member of law enforcement and use his state-issued identification badge to commit an act of sexual assault, criminal restraint, criminal coercion, theft by extortion, or impersonation of a law enforcement officer upon A.W., with the purpose to secure a nonpecuniary benefit to himself, 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 THREE

(Official Misconduct - Second Degree)

JUAN R. STEVENS

on or about February 24, 2012, in the Township of Westampton, County of Burlington, and within the jurisdiction of this Court, did commit the offense of Official Misconduct, in that JUAN R. STEVENS, a public servant, acting with the purpose to obtain a nonpecuniary benefit for himself, did commit one or more acts relating to his office, but constituting an unauthorized exercise 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 on him by law or clearly inherent in the nature of his office, that is, the said JUAN R. STEVENS, then and there being a public servant, to wit: a Senior Corrections Officer with the New Jersey Department of Corrections, and having thereby the official functions and duties of said position, including among others, to refrain from violating the laws, statutes, and ordinances of the United States or of any state of the United States, to refrain from acting or behaving, either in an official or private capacity, to his discredit or to the discredit of the New Jersey Department of Corrections, to observe and behave in a

manner consistent with the law enforcement higher standard both on and off-duty, to refrain from using New Jersey Department of Corrections property or equipment assigned to him in an unauthorized manner, to refrain from using or attempting to use his official position to secure unwarranted privileges or advantages for himself, 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 knowingly identify himself as a member of law enforcement and use his state-issued identification badge to commit an act of sexual assault, criminal restraint, criminal coercion, theft by extortion, or impersonation of a law enforcement officer upon D.N., with the purpose to secure a nonpecuniary benefit to himself, 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 FOUR

(Official Misconduct - Second Degree)

JUAN R. STEVENS

in or about July 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, did commit the offense of Official Misconduct, in that JUAN R. STEVENS, a public servant, acting with the purpose to obtain a nonpecuniary benefit for himself, did commit one or more acts relating to his office, but constituting an unauthorized exercise 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 on him by law or clearly inherent in the nature of his office, that is, the said JUAN R. STEVENS, then and there being a public servant, to wit: a Senior Corrections Officer with the New Jersey Department of Corrections, and having thereby the official functions and duties of said position, including among others, to refrain from violating the laws, statutes, and ordinances of the United States or of any state of the United States, to refrain from acting or behaving, either in an official or private capacity, to his discredit or to the discredit of the New Jersey Department of Corrections, to observe and behave in a manner consistent with the law



enforcement higher standard both on and off-duty, to refrain from using New Jersey Department of Corrections property or equipment assigned to him in an unauthorized manner, to refrain from using or attempting to use his official position to secure unwarranted privileges or advantages for himself, 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 knowingly identify himself as a member of law enforcement and use his state-issued identification badge to commit an act of sexual assault, criminal restraint, criminal coercion, theft by extortion, or impersonation of a law enforcement officer upon C.B., with the purpose to secure a nonpecuniary benefit to himself, 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 FIVE

(Pattern of Official Misconduct - Second Degree)

JUAN R. STEVENS

between May 2011 and July 2012, in the County of Burlington, and within the jurisdiction of this Court, did commit the offense of Pattern of Official Misconduct in that he did commit two or more acts of Official Misconduct, each in violation of N.J.S.A. 2C:30-2, that is, the said JUAN R. STEVENS, then and there being a public servant, to wit: a Senior Corrections Officer of the New Jersey Department of Corrections, and having thereby the official functions and duties of said position, including among others, to refrain from violating the laws, statutes, and ordinances of the United States or of any state of the United States, to refrain from acting or behaving, either in an official or private capacity, to his discredit or to the discredit of the New Jersey Department of Corrections, to observe and behave in a manner consistent with the law enforcement higher standard both on and off-duty, to refrain from using New Jersey Department of Corrections property or equipment assigned to him in an unauthorized manner, to refrain from using or attempting to use his official position to secure unwarranted privileges or advantages for himself, 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 ONE, TWO, THREE, and FOUR, which allegations are incorporated by reference as if fully set forth herein, contrary to the provisions of N.J.S.A. 2C:30-7, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Sexual Assault - Second Degree)

JUAN R. STEVENS

on or about May 23, 2011, in the Township of Mansfield, County of Burlington, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration upon L.P. by using physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-2(c)(1), and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Sexual Assault - Second Degree)

JUAN R. STEVENS

in or about January 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration upon A.W. by using physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-2(c)(1), and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Sexual Assault - Second Degree)

JUAN R. STEVENS

on or about February 24, 2012, in the Township of Westampton, County of Burlington, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration upon D.N. by using physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-2(c)(1), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Sexual Assault - Second Degree)

JUAN R. STEVENS

in or about July 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration upon C.B. by using physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-2(c)(1), and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Criminal Restraint - Third Degree)

JUAN R. STEVENS

on or about May 23, 2011, in the Township of Mansfield, County of Burlington, and within the jurisdiction of this Court, knowingly did hold L.P. in a condition of involuntary servitude, contrary to the provisions of N.J.S.A. 2C:13-2(b), and against the peace of this State, the government and dignity of the same.



COUNT ELEVEN

(Criminal Restraint - Third Degree)

JUAN R. STEVENS

in or about January 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, knowingly did hold A.W. in a condition of involuntary servitude, contrary to the provisions of N.J.S.A. 2C:13-2(b), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Criminal Restraint - Third Degree)

JUAN R. STEVENS

on or about February 24, 2012, in the Township of Westampton, County of Burlington, and within the jurisdiction of this Court, knowingly did hold D.N. in a condition of involuntary servitude, contrary to the provisions of N.J.S.A. 2C:13-2(b), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Criminal Restraint - Third Degree)

JUAN R. STEVENS

in or about July 2012, in the Township of Maple Shade,  
County of Burlington, and within the jurisdiction of this  
Court, knowingly did hold C.B. in a condition of  
involuntary servitude, contrary to the provisions of  
N.J.S.A. 2C:13-2(b), and against the peace of this State,  
the government and dignity of the same.

COUNT FOURTEEN

(Criminal Coercion - Third Degree)

JUAN R. STEVENS

on or about May 23, 2011, in the Township of Mansfield, County of Burlington, and within the jurisdiction of this Court, knowingly did threaten to accuse L.P. of an offense, to take or withhold action as an official against L.P., or to cause an official to take or withhold action against L.P., with the purpose to commit another crime and to unlawfully restrict the said L.P.'s freedom of action to engage in or refrain from engaging in conduct, contrary to the provisions of N.J.S.A. 2C:13-5(a)(2) or (4), and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Criminal Coercion - Third Degree)

JUAN R. STEVENS

in or about January 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, knowingly did threaten to accuse A.W. of an offense, to take or withhold action as an official against A.W., or to cause an official to take or withhold action against A.W., with the purpose to commit another crime and to unlawfully restrict the said A.W.'s freedom of action to engage in or refrain from engaging in conduct, contrary to the provisions of N.J.S.A. 2C:13-5(a)(2) or (4), and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Criminal Coercion - Third Degree)

JUAN R. STEVENS

on or about February 24, 2012, in the Township of Westampton, County of Burlington, and within the jurisdiction of this Court, knowingly did threaten to accuse D.N. of an offense, to take or withhold action as an official against D.N., or to cause an official to take or withhold action against D.N., with the purpose to commit another crime and to unlawfully restrict the said D.N.'s freedom of action to engage in or refrain from engaging in conduct, contrary to the provisions of N.J.S.A. 2C:13-5(a)(2) or (4), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Criminal Coercion - Third Degree)

JUAN R. STEVENS

in or about July 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, knowingly did threaten to accuse C.B. of an offense, to take or withhold action as an official against C.B., or to cause an official to take or withhold action against C.B., with the purpose to commit another crime and to unlawfully restrict the said C.B.'s freedom of action to engage in or refrain from engaging in conduct, contrary to the provisions of N.J.S.A. 2C:13-5(a)(2) or (4), and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Theft by Extortion - Second Degree)

JUAN R. STEVENS

on or about May 23, 2011, in the Township of Mansfield, County of Burlington, and within the jurisdiction of this Court, did commit the offense of Theft by Extortion, in that the said JUAN R. STEVENS, purposely did obtain by extortion the property of L.P., that is, compensation for services, by purposely threatening to accuse L.P. of an offense, to take or withhold action as an official against L.P., or to cause an official to take or withhold action against L.P., contrary to the provisions of N.J.S.A. 2C:20-5 (b) or (d), and against the peace of the this State, the government and dignity of the same.



COUNT NINETEEN

(Theft by Extortion - Second Degree)

JUAN R. STEVENS

in or about January 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, did commit the offense of Theft by Extortion, in that the said JUAN R. STEVENS, purposely did obtain by extortion the property of A.W., that is, compensation for services, by purposely threatening to accuse A.W. of an offense, to take or withhold action as an official against A.W., or to cause an official to take or withhold action against A.W., contrary to the provisions of N.J.S.A. 2C:20-5 (b) or (d), and against the peace of the this State, the government and dignity of the same.

COUNT TWENTY

(Theft by Extortion - Second Degree)

JUAN R. STEVENS

on or about February 24, 2012, in the Township of Westampton, County of Burlington, and within the jurisdiction of this Court, did commit the offense of Theft by Extortion, in that the said JUAN R. STEVENS, purposely did obtain by extortion the property of D.N., that is, compensation for services, by purposely threatening to accuse D.N. of an offense, to take or withhold action as an official against D.N., or to cause an official to take or withhold action against D.N., contrary to the provisions of N.J.S.A. 2C:20-5 (b) or (d), and against the peace of the this State, the government and dignity of the same.

COUNT TWENTY-ONE

(Theft by Extortion - Second Degree)

JUAN R. STEVENS

in or about July 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, did commit the offense of Theft by Extortion, in that the said JUAN R. STEVENS, purposely did obtain by extortion the property of C.B., that is, compensation for services, by purposely threatening to accuse C.B. of an offense, to take or withhold action as an official against C.B., or to cause an official to take or withhold action against C.B., contrary to the provisions of N.J.S.A. 2C:20-5 (b) or (d), and against the peace of the this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Impersonating a Law Enforcement Officer - Fourth Degree)

JUAN R. STEVENS

on or about May 23, 2011, in the Township of Mansfield, County of Burlington, and within the jurisdiction of this Court, did falsely pretend to hold a position as an officer or member or employee or agent of an organization or association of law enforcement officers with the purpose to induce L.P. to submit to such pretended official authority or to otherwise act in reliance upon that pretense, contrary to the provisions of N.J.S.A. 2C:28-8(b), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-THREE

(Impersonating a Law Enforcement Officer - Fourth Degree)

JUAN R. STEVENS

in or about January 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, did falsely pretend to hold a position as an officer or member or employee or agent of an organization or association of law enforcement officers with the purpose to induce A.W. to submit to such pretended official authority or to otherwise act in reliance upon that pretense, contrary to the provisions of N.J.S.A. 2C:28-8(b), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Impersonating a Law Enforcement Officer - Fourth Degree)

JUAN R. STEVENS

on or about February 24, 2012, in the Township of Westampton, County of Burlington, and within the jurisdiction of this Court, did falsely pretend to hold a position as an officer or member or employee or agent of an organization or association of law enforcement officers with the purpose to induce D.N. to submit to such pretended official authority or to otherwise act in reliance upon that pretense, contrary to the provisions of N.J.S.A. 2C:28-8(b), and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Impersonating a Law Enforcement Officer - Fourth Degree)

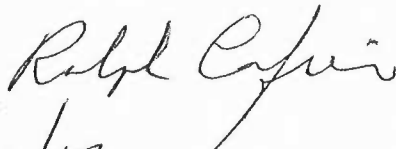
JUAN R. STEVENS

in or about July 2012, in the Township of Maple Shade, County of Burlington, and within the jurisdiction of this Court, did falsely pretend to hold a position as an officer or member or employee or agent of an organization or association of law enforcement officers with the purpose to induce C.B. to submit to such pretended official authority or to otherwise act in reliance upon that pretense, contrary to the provisions of N.J.S.A. 2C:28-8(b), and against the peace of this State, the government and dignity of the same.

  
Elie Honig, Director  
Division of Criminal Justice

A TRUE BILL:

Foreperson



Dated:

7/16/13