



that said voters did not make candidate selections on the ballots, contrary to the provisions of N.J.S.A. 19:34-1.1a(2) and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Fraud in Casting Mail-in Vote - Third Degree)

MICHAEL JACKSON

between on or about January 1, 2020 and on or about May 12, 2020, in the City of Paterson, County of Passaic, and within the jurisdiction of this Court, did knowingly violate or aid or abet another in violating one or more of the provisions of N.J.S.A. 19:63-1, et seq., that is, the said MICHAEL JACKSON, being a candidate in the election for which mail-in ballots were issued to other voters, did serve as an authorized messenger or bearer of one or more said mail-in ballots for delivery to the Passaic County Board of Elections, did serve as a messenger or bearer for more than three said mail-in ballots or did knowingly take or attempt to take said mail-in ballots from one or more voters or other persons having custody of said mail-in ballots for the purpose of delivering the same to the Passaic County Board of Elections, or to a postal box or post office, without signing and printing his name on the outer envelope in violation of N.J.S.A. 19:63-27, and contrary to the provisions of N.J.S.A. 19:63-16d(3), N.J.S.A. 19:63-27, and N.J.S.A. 19:63-28, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Unauthorized Possession of Ballots - Third Degree)

MICHAEL JACKSON

between on or about January 1, 2020 and on or about May 12, 2020, in the City of Paterson, County of Passaic, and within the jurisdiction of this Court, did willfully have in his possession one or more official mail-in ballots without being authorized to have charge or possession thereof, that is, the said MICHAEL JACKSON had in his possession one or more official mail-in ballots issued to other voters, while being a candidate in the election for which the said mail-in ballots were issued to voters, did possess as a bearer more than three said mail-in ballots or did possess one or more said mail-in ballots issued to other voters without completing the bearer information required by N.J.S.A. 19:63-27, contrary to the provisions of N.J.S.A. 19:34-3, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

MICHAEL JACKSON

between on or about January 1, 2020 and on or about May 12, 2020, in the City of Paterson, County of Passaic, and within the jurisdiction of this Court, with 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, or required by law to be kept by others for information of the government, that is, the said MICHAEL JACKSON did knowingly present or offer for filing to the Passaic County Board of Elections one or more official mail-in ballots issued to other voters without completing the bearer information as required by N.J.S.A 19:63-27 or which were fraudulently voted by someone other than the voter, with the intent to defraud the Passaic County Board of Elections, 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.



FILED  
February 17, 2021  
State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ750-21-10  
Superior Court  
Docket Number 21-2-17-S

STATE OF NEW JERSEY            )  
  
                                          v.                                            )  
  
MICHAEL JACKSON                    )

ORDER OF VENUE

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

IT IS ORDERED on this *17th day of February, 2021*, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Passaic 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 Passaic for filing.

/s/Mary C. Jacobson  
**Mary C. Jacobson, A.J.S.C.**