

**FILED
FEBRUARY 24, 2021
STATE GRAND JURY JUDGE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ750-21-11
Superior Court
Docket Number 21-2-18-S

STATE OF NEW JERSEY)

V.)

INDICTMENT

ALEX MENDEZ)

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

COUNT ONE

(Election Fraud - Second Degree)

ALEX MENDEZ

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, knowingly and willfully did deprive, defraud or attempt to deprive or defraud the residents of this State of a fair and impartially conducted election by the procurement or submission of one or more voter registration applications that were known by the said ALEX MENDEZ to be materially false, fictitious or fraudulent under the provisions of Title 19 of the New Jersey Statutes, that is, the said ALEX MENDEZ knowingly and willfully did cause the name of a voter, Voter #1,

who is known to the grand jurors, who did not reside in the Third Ward, District 10 to be registered to vote in the Third Ward, District 10, knowing that the voter did not reside in the Third Ward, District 10, or the said ALEX MENDEZ knowingly and willfully did attempt to cause the name of a voter, Voter #2, who is known to the grand jurors, who did not reside in the Third Ward, to be registered to vote in the Third Ward, knowing that the voter did not reside in the Third Ward, contrary to the provisions of N.J.S.A. 19:34-1.1a(2), and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT TWO

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

ALEX MENDEZ

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 violate or did knowingly 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 ALEX MENDEZ, 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. 19:63-28, N.J.S.A. 19:63-16d(3), and N.J.S.A. 19:63-27, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Unauthorized Possession of Ballots - Third Degree)

ALEX MENDEZ

between on or about January 1, 2020 and 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 ALEX MENDEZ 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)

ALEX MENDEZ

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, 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 ALEX MENDEZ 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 did knowingly present or offer for filing one or more voter registration applications that were known by the said ALEX MENDEZ to be materially false, fictitious or fraudulent, 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.

COUNT FIVE

(Falsifying or Tampering with Records - Fourth Degree)

ALEX MENDEZ

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 deceive or injure another or to conceal a wrongdoing, knowingly did falsify, destroy, remove, conceal or utter any writing or record knowing that it contains a false statement or information, that is, the said ALEX MENDEZ knowingly did 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, knowing that one or more official mail-in ballots contained a false statement or information or did knowingly present or offer for filing one or more voter registration applications that were known by the said ALEX MENDEZ to be materially false, fictitious or fraudulent, with the purpose to deceive the Passaic County Board of Elections, contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(False Registration or Transfer - Third Degree)

ALEX MENDEZ

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, knowingly did cause the name of another person to be registered in the Third Ward in the City of Paterson, knowing that such other person was not entitled to vote in the election district wherein such registry was made at the next election to be held therein, that is, the said ALEX MENDEZ did cause the name of a voter, Voter #1, who is known to the grand jurors, who did not reside in Third Ward, District 10, to be registered to vote in the Third Ward, District 10, knowing that the voter did not reside in the Third Ward, District 10, contrary to the provisions of N.J.S.A. 19:34-1 and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Attempted False Registration or Transfer - Third Degree)

ALEX MENDEZ

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, knowingly did or omitted to do anything, with the purpose of causing or procuring the name of another person to be registered in the Third Ward in the City of Paterson, knowing that such other person was not entitled to vote in the election district wherein such registry was made at the next election to be held therein, without further conduct on his part, that is, the said ALEX MENDEZ did attempt to cause or procure the name of a voter, Voter #2, who is known to the grand jurors, who did not reside in the Third Ward to be registered to vote in the Third Ward, knowing that the voter did not reside in the Third Ward, contrary to the provisions of N.J.S.A. 2C:5-1, N.J.S.A.

19:34-1 and N.J.S.A. 2C:2-6 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:

[REDACTED] Foreperson

Dated: 2/24/2021

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STATE OF NEW JERSEY)

v.)

ALEX MENDEZ)

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 **24TH 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.

Darlene J. Pereksta
Darlene J. Pereksta, J.S.C.