

SUPERIOR COURT OF N.J.  
FILED

MAR 27 2006

DONALD F. FHELAN  
CLERK

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ521-06-2(1)

Superior Court 06-03-00022-S  
Docket Number

STATE OF NEW JERSEY )

v. )

TYRONE G. BAXTER )  
also known as )  
TYMAIK BAXTER )  
also known as )  
TYMEEK BAXTER )

INDICTMENT

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

COUNT ONE

(Official Misconduct - Second Degree)

TYRONE G. BAXTER

on or about July 20, 2001, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another or to injure or deprive another of a benefit, did commit an act relating to his duties as a New Jersey Division of Motor Vehicles clerk, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized, that is, the said TYRONE G. BAXTER, while employed as a clerk at the New Jersey Division of Motor Vehicles Commission, thereby performing a governmental function, having thereby the official functions

duties, among others, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, with purpose to obtain a benefit for himself, knowing that such act was unauthorized, did issue a New Jersey Drivers License to David Eugene Bridgeforth, Jr., depicting the photograph of David Eugene Bridgeforth, Jr., but the name and pedigree information of Matthew Bade, and did directly or indirectly accept \$300 as consideration for the issuance of the fraudulent license, contrary to the provisions of N.J.S.A. 2C:30-2a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Forgery - Third Degree)

TYRONE G. BAXTER

on or about July 20, 2001, 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, complete, execute, issue or transfer a writing of another, that is New Jersey Division of Motor Vehicles documents, said writings being a part of licenses or personal identifying information issued by the government, in the name of Matthew Bade, so that it purported to be the act of the named applicant who did not authorize such act, or the act of a fictitious person, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Tampering with Public Records or Information - Third Degree)

TYRONE G. BAXTER

on or about July 20, 2001, 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 knowingly make a false entry in any record, document or thing, 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 TYRONE G. BAXTER did knowingly make a false entry in the record of a New Jersey Division of Motor Vehicles Driver License in the name of Matthew Bade, belonging to, or received or kept by, the State of New Jersey, New Jersey Division of Motor Vehicles, for information or record, contrary to the provisions of N.J.S.A. 2C:28-7a(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Falsifying Records - Fourth Degree)

TYRONE G. BAXTER

on or about July 20, 2001, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to deceive or injure another, did falsify a writing or record, that is, the said TYRONE G. BAXTER did falsify New Jersey Division of Motor Vehicles documents in the name of Matthew Bade, which contained false statements or information, contrary to the provisions of N.J.S.A. 2C:21-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Official Misconduct - Second Degree)

TYRONE G. BAXTER

on or about January 7, 2002, at the City of Trenton, in the County of Mercer, and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another or to injure or deprive another of a benefit, did commit an act relating to his duties as a New Jersey Division of Motor Vehicles clerk, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized, did commit an act relating to his official duties, knowing that such act was unauthorized or that he was committing such act in an unauthorized manner, that is, the said TYRONE G. BAXTER, while employed as a clerk at the New Jersey Division of Motor Vehicles, thereby performing a governmental function, having thereby the official functions and duties, among others, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, with purpose to obtain a benefit for himself, knowing that such act was unauthorized, did obtain a fraudulent New Jersey Division of Motor Vehicles document, that is, a New Jersey Non-Driver Photographic Identification bearing the name and pedigree information of Tymaik Baxter, a fictitious person,

contrary to the provisions of N.J.S.A. 2C:30-2a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Forgery - Third Degree)

TYRONE G. BAXTER

on or about January 7, 2002, 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, complete, execute, issue, transfer, or utter a writing of another, that is New Jersey Division of Motor Vehicles documents, said writings being a part of licenses or personal identifying information issued by the government, in the name of Tymaik Baxter, so that it purported to be the act of the named applicant who did not authorize such act, or the act of a fictitious person, contrary to the provisions of N.J.S.A. 2C:21-1a(2), N.J.S.A. 2C:21-1a(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Tampering with Public Records or Information - Third Degree)

TYRONE G. BAXTER

on or about January 7, 2002, 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 TYRONE G. BAXTER, with the purpose to defraud or injure another, did make or offer for filing or use New Jersey Division of Motor Vehicles documents in the name of Tymaik Baxter, knowing them to be false and with purpose that they be taken as a genuine part of information or records belonging to, or received or kept by, the State of New Jersey, New Jersey Division of Motor Vehicles for information or record, 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 EIGHT

(Falsifying Records - Fourth Degree)

TYRONE G. BAXTER

on or about January 7, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to deceive or injure another, did falsify a writing or record, or did utter a writing or record knowing same to contain false statements or information, that is, the said TYRONE G. BAXTER did falsify or utter New Jersey Division of Motor Vehicles documents in the name of Tymaik Baxter, which contained false statements or information, contrary to the provisions of N.J.S.A. 2C:21-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Official Misconduct - Second Degree)

TYRONE G. BAXTER

on or about August 13, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another or to injure or deprive another of a benefit, did commit an act relating to his duties as a New Jersey Division of Motor Vehicles clerk, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized, that is, the said TYRONE G. BAXTER, while employed as a clerk at the New Jersey Division of Motor Vehicles, thereby performing a governmental function, having thereby the official functions and duties, among others, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, with purpose to obtain a benefit for himself, knowing that such act was unauthorized, did obtain a fraudulent New Jersey Division of Motor Vehicle document, that is, Title for a 1989 Plymouth in the name of Tymaik Baxter, a fictitious person, contrary to the provisions of N.J.S.A. 2C:30-2a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Forgery - Third Degree)

TYRONE G. BAXTER

on or about August 13, 2002, 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, did make, complete, execute, issue, transfer, or utter a writing of another, that is New Jersey Division of Motor Vehicles documents, said writings being a part of licenses or personal identifying information issued by the government, in the name of Tymaik Baxter, so that it purported to be the act of the named applicant who did not authorize such act, or the act of a fictitious person, contrary to the provisions of N.J.S.A. 2C:21-1a(2), N.J.S.A. 2C:21-1a(3) 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)

TYRONE G. BAXTER

on or about August 13, 2002, 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 TYRONE G. BAXTER, with the purpose to defraud or injure another, did make or offer for filing or use New Jersey Division of Motor Vehicles documents in the name of Tymaik Baxter, knowing them to be false and with purpose that they be taken as a genuine part of information or records belonging to, or received or kept by, the State of New Jersey, New Jersey Division of Motor Vehicles, for information or record, 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

(Falsifying Records - Fourth Degree)

TYRONE G. BAXTER

on or about August 13, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to deceive or injure another, did falsify a writing or record, or did utter a writing or record knowing same to contain false statements or information, that is, the said TYRONE G. BAXTER did falsify or utter New Jersey Division of Motor Vehicles documents in the name of Tymaik Baxter, which contained false statements or information, contrary to the provisions of N.J.S.A. 2C:21-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Official Misconduct - Second Degree)

TYRONE G. BAXTER

on or about August 13, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another or to injure or deprive another of a benefit, did commit an act relating to his duties as a New Jersey Division of Motor Vehicles clerk, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized, that is, the said TYRONE G. BAXTER, while employed as a clerk at the New Jersey Division of Motor Vehicles, thereby performing a governmental function, having thereby the official functions and duties, among others, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, with purpose to obtain a benefit for himself, knowing that such act was unauthorized, did issue a fraudulent New Jersey Division of Motor Vehicle document, that is, Registration for a 1989 Plymouth in the name of Tymaik Baxter, a fictitious person, contrary to the provisions of N.J.S.A. 2C:30-2a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Forgery - Third Degree)

TYRONE G. BAXTER

on or about August 13, 2002, 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, did make, complete, execute, issue, transfer, or utter, a writing of another, that is New Jersey Division of Motor Vehicles documents, said writings being a part of licenses or personal identifying information issued by the government, in the name of Tymaik Baxter, so that it purported to be the act of the named applicant who did not authorize such act, or the act of a fictitious person, contrary to the provisions of N.J.S.A. 2C:21-1a(2), N.J.S.A. 2C:21-1a(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Tampering with Public Records or Information - Third Degree)

TYRONE G. BAXTER

on or about August 13, 2002, 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 TYRONE G. BAXTER, with the purpose to defraud or injure another, did make or offer for filing or use New Jersey Division of Motor Vehicles documents in the name of Tymaik Baxter, knowing them to be false and with purpose that they be taken as a genuine part of information or records belonging to, or received or kept by, the State of New Jersey, New Jersey Division of Motor Vehicles, for information or record, 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 SIXTEEN

(Falsifying Records - Fourth Degree)

TYRONE G. BAXTER

on or about August 13, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with the purpose to deceive or injure another, did falsify a writing or record, or did utter a writing or record knowing same to contain false statements or information, that is, the said TYRONE G. BAXTER did falsify or utter New Jersey Division of Motor Vehicles documents in the name of Tymaik Baxter, which contained false statements or information, contrary to the provisions of N.J.S.A. 2C:21-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Official Misconduct - Second Degree)

TYRONE G. BAXTER

between on or about November 6, 2002 and on or about November 13, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another or to injure or deprive another of a benefit, did commit an act relating to his duties as a New Jersey Division of Motor Vehicles clerk, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized, that is, the said TYRONE G. BAXTER, while employed as a clerk at the New Jersey Motor Vehicle Commission, thereby performing a governmental function, having thereby the official functions and duties, among others, to perform his duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, with purpose to obtain a benefit for himself, knowing that such act was unauthorized, did issue a fraudulent New Jersey Division of Motor Vehicle document, that is, a New Jersey Driver License depicting the photograph of Lashanda Ronnette Gates, but bearing the name and pedigree information of Tonya F. Stafford, and did directly or indirectly accept \$300 as consideration for the issuance of the fraudulent license contrary to the provisions of N.J.S.A. 2C:30-2a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

