

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.

COUNT EIGHTEEN

(Forgery - Third Degree)

TYRONE G. BAXTER

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 the purpose to defraud or injure another, did make, complete, execute, issue, authorize 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 Tanya F. Stafford, so that it purported to be the act of the named applicant who did not authorize such act, or 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 NINETEEN

(Tampering with Public Records or Information - Third Degree)

TYRONE G. BAXTER

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 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, 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 Tanya F. Stafford, 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 TWENTY

(Falsifying Records - Fourth Degree)

TYRONE G. BAXTER

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 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 Tanya F. Stafford, 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 TWENTY-ONE

(Theft of Identity - Third Degree)

TYRONE G. BAXTER

on or about November 13, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did obtain personal identifying information pertaining to another person and did use that information, or assist another person in using that information, in order to assume the identity of or represent themselves as another person, without that person's authorization, and with the purpose to fraudulently obtain a pecuniary benefit in excess of \$500, that is, said TYRONE G. BAXTER did provide the name, New Jersey driver's license number, and other identifying information of Tanya F. Stafford, and did use the information, or assist another person in using the information, without Tanya F. Stafford's authorization, for the purpose of fraudulently obtaining a pecuniary benefit of \$500 or more, contrary to the provisions of N.J.S.A. 2C:21-17a(4) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Forgery - Third Degree)

TYRONE G. BAXTER

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 the purpose to defraud or injure another, did make, complete, execute, issue, transfer, or utter a writing of another, that is a bank check drawn on the account of Tanya F. Stafford, said writing being or purporting to be a check, in the name of Tanya F. Stafford, or the endorsement thereof, 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 TWENTY-THREE

(Attempted Theft by Deception - Third Degree)

TYRONE G. BAXTER

on or about November 13, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did purposely attempt to obtain property of another by deception, that is, the said TYRONE G. BAXTER, did purposely attempt to obtain United States currency from Global Check Cashing Service, by creating or reinforcing a false impression that the person presenting a check for \$6,100 payable to Tanya F. Stafford, was Tanya F. Stafford;

WHEREAS, in truth and in fact, as the said TYRONE G. BAXTER, well knew, the individual presenting the check for cashing was not Tanya F. Stafford, who did not authorize this transaction, contrary to the provisions of N.J.S.A. 2C:5-1, N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Attempted Official Misconduct - Second Degree)

TYRONE G. BAXTER:

between on or about November 13, 2002 and on or about January 7, 2003, 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 purposely attempt to issue fraudulent New Jersey Division of Motor Vehicles document, that is, a New Jersey Driver License to an undercover law enforcement officer whose identity is known to the Grand Jurors, depicting the photograph of said undercover law enforcement officer, but bearing the name and pedigree information of another, contrary to

the provisions of N.J.S.A. 2C:5-1, 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 TWENTY-FIVE

(Attempted Forgery - Third Degree)

TYRONE G. BAXTER

between on or about November 13, 2002 and on or about January 7, 2003, 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 attempt to 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 another, 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:5-1, 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 TWENTY-SIX

(Attempted Tampering with Public Records or Information -
Third Degree)

TYRONE G. BAXTER

between on or about November 13, 2002 and on or about January 7, 2003, 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 attempt to make, present, offer for filing, or use any record, document or thing, knowing it to be false, and with the purpose that it be taken as a genuine part of the 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 TYRONE G. BAXTER, did attempt to make, present, offer for filing or use, New Jersey Division of Motor Vehicles documents in the name of another, containing false information concerning the identity and pedigree information of the purported applicant which was submitted to the New Jersey Division of Motor Vehicles, contrary to the provisions of N.J.S.A. 2C:5-1, 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 TWENTY-SEVEN

(Attempted Falsifying Records - Fourth Degree)

TYRONE G. BAXTER

between on or about November 13, 2002 and on or about January 7, 2003, 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 attempt to falsify a writing or record, that is, the said TYRONE G. BAXTER did attempt to falsify New Jersey Division of Motor Vehicles documents in the name of another, which contained false statements or information, contrary to the provisions of N.J.S.A. 2C:5-1, 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 TWENTY-EIGHT

(Official Misconduct - Second Degree)

TYRONE G. BAXTER.

on or about January 8, 2003, 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 unlawfully take or exercise unlawful control over New Jersey Division of Motor Vehicle Documents, to wit: blank temporary inspection cards, 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 TWENTY-NINE

(Receiving Stolen Property - Third Degree)

TYRONE G. BAXTER

on or about January 8, 2003, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did knowingly receive or bring into this State movable property of another knowing that it has been stolen or believing it is probably stolen, that is, New Jersey Division of Motor Vehicles blank temporary inspection cards, contrary to the provisions of N.J.S.A. 2C:20-7a, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Bribery - 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, did directly or indirectly solicit, accept or agree to accept in excess of \$200 as consideration for violation of his official duties as a New Jersey Division of Motor Vehicles clerk, that is, the said TYRONE G. BAXTER did agree to accept approximately \$300 as consideration for issuing a fraudulent New Jersey driver's license in the name of Matthew Bade, contrary to the provisions of N.J.S.A. 2C:27-2c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Bribery - Second Degree)

TYRONE G. BAXTER

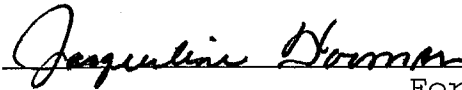
on or about November 13, 2002, at the City of Trenton, in the County of Mercer, elsewhere and within the jurisdiction of this Court, did directly or indirectly solicit, accept or agree to accept in excess of \$200 as consideration for violation of his official duties as a New Jersey Division of Motor Vehicles clerk, that is, the said TYRONE G. BAXTER did agree to accept approximately \$300 as consideration for issuing a fraudulent New Jersey driver's license in the name of Tanya F. Stafford, contrary to the provisions of N.J.S.A. 2C:27-2c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

GREGORY A. PAW, Director

by: 

Philip Aronow, Deputy Attorney General
Division of Criminal Justice

A TRUE BILL:


Foreperson

Dated: 03/27/06

SUPERIOR COURT OF N.J.
FILED

MAR 27 2006

DONALD F. PHELAN
CLERK

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ521-06-2(1)

Superior Court

Docket Number

06-03-00022.S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

TYRONE G. BAXTER)

also known as)

TYMAIK BAXTER)

also known as)

TYMEEK BAXTER)

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

IT IS ORDERED on this 27th day of March, 2006, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer 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 Mercer for filing.

Linda R. Feinberg, A.J.S.C.

