

**FILED**  
**SEP 16 2019**  
**State Grand Jury Judge**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ736-19-16  
Superior Court  
Docket Number 19-09-00109-S

STATE OF NEW JERSEY )  
v. ) INDICTMENT  
GUILLERMO QUINONES )  
DOMITILO CARREON )  
and )  
MARITZA MARTINEZ )

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

COUNT ONE

(Conspiracy - Second Degree)

GUILLERMO QUINONES

DOMITILO CARREON

MARITZA MARTINEZ

and one or more other persons whose identities are both known  
and unknown to the Grand Jurors, who are co-conspirators but not

named as defendants herein, between on or about February 25, 2011, and December 31, 2016, at the City of New Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Official Misconduct, Pattern of Official Misconduct, Bribery in Official and Political Matters, Theft by Unlawful Taking or Disposition, or Tampering with Public Records or Information, did agree that:

A. One or more of them would knowingly engage in conduct which would constitute the aforesaid crime(s), or

B. One or more of them would knowingly aid in the planning solicitation or commission of said crimes, that is:

1. Official Misconduct, in that one or more of them, being a public servant, would knowingly commit an act related to his office but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized or that it was being committed in an unauthorized manner, or that he would knowingly refrain from performing a duty which is imposed on him by law or clearly inherent in the nature of his office, with the purpose to derive a benefit for himself or another in excess of \$200, or to injure or deprive another of a benefit in excess of \$200, contrary to the provisions of

N.J.S.A. 2C:30-2;

2. Pattern of Official Misconduct, in that one or more of them, being a public servant, would, acting with purpose to obtain a benefit for himself or another in excess of \$200, or to injure or deprive another of a benefit in excess of \$200, commit two or more acts of Official Misconduct that violate the provisions of N.J.S.A. 2C:30-2, at least one of which was a crime of the second degree, contrary to the provisions of N.J.S.A. 2C:30-7;

3. Bribery in Official and Political Matters, in that one or more of them would knowingly solicit, accept, or agree to accept from another, or knowingly directly or indirectly offer, confer or agree to confer upon a public servant, a benefit, that is money in excess of \$200, as consideration for the performance or violation of an official duty, contrary to the provisions of N.J.S.A. 2C:27-2;

4. Tampering with Public Records or Information; in that one or more of them would knowingly make a false entry in, or false alteration of, 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 or would 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 information or

records belonging to, received or kept by, the government for information or record, or required by law to be kept by others for information of the government, contrary to the provisions of N.J.S.A. 2C:28-7.

5. Theft by Unlawful Taking or Disposition; in that one or more of them would knowingly take or exercise unlawful control over the property of another with purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3(a).

All in violation of the provisions of N.J.S.A. 2C:5-2, and against the peace of this state, the government, and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

GUILLERMO QUINONES

DOMITILO CARREON

between on or about February 25, 2011, and December 31, 2016, at the City of New Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said GUILLERMO QUINONES, being a public servant and acting with the purpose to obtain a benefit for himself or another in excess of \$200, or to injure or deprive another of a benefit in excess of \$200, did commit an act relating to his office, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized or that he was committing it in an unauthorized manner, or did refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and the said GUILLERMO QUINONES, then and there being a public servant, to wit: a Water Meter Reader with the Water Department of the City of New Brunswick, having thereby the official functions and duties, among others, to keep legible and accurate records, to record readings to serve as a basis for measuring water consumption, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did

solicit, accept or agree to accept funds in excess of \$200 in exchange for the violation of his official duty as a public servant or as consideration for the performance of his official duty, namely, as consideration for facilitating the alteration or reduction of water bills for one or more residents of the City of New Brunswick or did, knowing the same to be false, make, present, offer for filing or use one or more falsified municipal water and sewer bills for one or more properties located within the City of New Brunswick, including that of the said DOMITILO CARREON, with the purpose to secure a benefit to himself or another in excess of \$200, or to injure or deprive another of a benefit in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Official Misconduct - Second Degree)

GUILLERMO QUINONES

MARITZA MARTINEZ

between on or about February 25, 2011, and December 31, 2016, at the City of New Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did commit the offense of official misconduct, in that the said GUILLERMO QUINONES, being a public servant and acting with the purpose to obtain a benefit for himself or another in excess of \$200, or to injure or deprive another of a benefit in excess of \$200, did commit an act relating to his office, but constituting an unauthorized exercise of his official functions, knowing that such act was unauthorized or that he was committing it in an unauthorized manner, or did refrain from performing a duty imposed upon him by law or clearly inherent in the nature of his office, and the said GUILLERMO QUINONES, then and there being a public servant, to wit: a Water Meter Reader with the Water Department of the City of New Brunswick, having thereby the official functions and duties, among others, to keep legible and accurate records, to record readings to serve as a basis for measuring water consumption, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did

solicit, accept or agree to accept funds in excess of \$200 in exchange for the violation of his official duty as a public servant or as consideration for the performance of his official duty, namely, as consideration for facilitating the alteration or reduction of water bills for one or more residents of the City of New Brunswick, or did, knowing the same to be false, make, present, offer for filing or use one or more falsified municipal water and sewer bills for one or more properties located within the City of New Brunswick, including that of the said MARITZA MARTINEZ, with the purpose to secure a benefit to himself or another in excess of \$200, or to injure or deprive another of a benefit in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT FOUR

(Pattern of Official Misconduct - Second Degree)

GUILLERMO QUINONES

between on or about February 25, 2011, and December 31, 2016, at the City of New Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did the commit the offense of Pattern of Official Misconduct in that the said GUILLERMO QUINONES, did commit two or more acts of Official Misconduct, each in violation of N.J.S.A. 2C:30-2, that is, the said GUILLERMO QUINONES, being a public servant, to wit: an employee of the City of New Brunswick Water Department, having thereby the official functions and duties, among others, to keep legible and accurate records, to record readings to serve as a basis for measuring water consumption, 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 Two and Three, 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 FIVE

(Bribery in Official and Political Matters - Second Degree)

GUILLERMO QUINONES

between on or about February 25, 2011, and on or about December 31, 2016, at the City of New Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly solicit, accept, or agree to accept from another a benefit, that is money in excess of \$200, as consideration for the violation of his official duties as a public servant or as consideration for the performance of his official duties as a public servant, that is: the said GUILLERMO QUINONES an employee of the City of New Brunswick Water Department, knowingly did directly or indirectly solicit, accept, or agree to accept from another a benefit, that is money in excess of \$200, as consideration for facilitating the alteration or reduction of water bills for at least one resident of the City of New Brunswick, contrary to the provisions of N.J.S.A. 2C:27-2, and against the peace of this State, the government, and dignity of the same.

COUNT SIX

(Theft by Unlawful Taking or Disposition - Third Degree)

GUILLERMO QUINONES

DOMITILO CARREON

MARITZA MARTINEZ

between on or about February 25, 2011, and December 31, 2016, at the City of New Brunswick, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did commit the crime of Theft by Unlawful Taking or Disposition, in that the named GUILLERMO QUINONES, DOMITILO CARREON, and MARITZA MARTINEZ, did unlawfully take or exercise unlawful control over the property of another, namely, money owed to the City of New Brunswick for water and sewer utility payments, with the purpose to deprive the owner thereof, in an amount greater than \$500 but less than \$75,000, contrary to the provisions of N.J.S.A. 2C:20-3(a), 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)

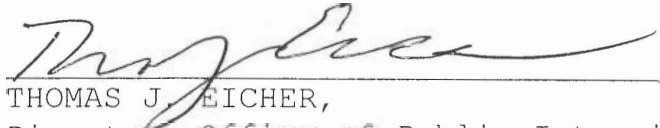
GUILLERMO QUINONES

DOMITILO CARREON

MARITZA MARTINEZ

between on or about February 25, 2011, and on or about December 31, 2016, at the City of New Brunswick, in the County of Middlesex, elsewhere, 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 the purpose that it be taken as a genuine part of information or records belonging to, 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 GUILLERMO QUINONES, DOMITILO CARREON, and MARITZA MARTINEZ, knowing the same to be false, did make, present, offer for filing or use one or more falsified municipal water and sewer bills for one or more properties located within the City of New Brunswick, contrary to the provisions of N.J.S.A. 2C:28-7(a)(2) and

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

  
THOMAS J. EICHER,  
Director, Office of Public Integrity  
and Accountability

A TRUE BILL:

  
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**State Grand Jury Judge**

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v. )

GUILLERMO QUINONES )

DOMITILO CARREON )

and )

MARITZA MARTINEZ )

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 16th day of September, 2019, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Union 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 Union for filing.

Mary C. Jacobson, A.J.S.C.  
Mary C. Jacobson, A.J.S.C.