

NEW JERSEY SUPERIOR COURT  
HUNTERDON COUNTY  
LAW DIVISION  
(CRIMINAL)

FILED/RECEIVED  
2017 JAN 19 PM 1:40

CASE MANAGEMENT  
CRIMINAL  
HUNTERDON COUNTY

THE STATE OF NEW JERSEY  
vs

FILE NO. 16000671  
INDICTMENT NO. 17-01-00032-I  
STATED SESSION: NOVEMBER  
TERM: 2016

JASON MAYS

Defendant

COUNT 1

OFFICIAL MISCONDUCT

2<sup>ND</sup> DEGREE

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths present that Jason Mays, on diverse dates between July 1, 2016 and August 31, 2016 in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did with purpose to obtain a benefit for himself or another commit acts relating to his office but constituting an unauthorized exercise of his official functions, to wit, engaging in sexual conduct with an J. Doe 1, when the said actor was a corrections officer and such act was unauthorized or committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a, and against the peace of this State, the Government and dignity of the same.

COUNT 2

CRIMINAL COERCION

3<sup>RD</sup> DEGREE

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on diverse dates between July 1, 2016 and August 31, 2016 in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, with purpose to unlawfully restrict another's freedom of action to engage or refrain from engaging in conduct, did threatened J. Doe 1 with institutional disciplinary charges if J. Doe 1 did not undress, contrary to the provisions of N.J.S.A. 2C:13-5(a)(4), and against the peace of this State, the Government and dignity of the same.

**Indictment No. 17-01-00032-I**

**COUNT 3                      CRIMINAL SEXUAL CONTACT                      4<sup>TH</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on about or between July 1, 2016 and August 31, 2016 in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual contact with J. Doe 1, specifically by touching her intimate body part, for the purpose of sexually arousing or sexually gratifying himself or to humiliate or degrade the said victim, contrary to the provisions of N.J.S.A. 2C:14-3b, and N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**COUNT 4                      OFFICIAL MISCONDUCT                      2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on or about July 3, 2016 in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did with purpose to obtain a benefit for himself or another commit acts relating to his office but constituting an unauthorized exercise of his official functions, to wit, engaging in sexual conduct with J. Doe 2, when the said actor was a corrections officer and such act was unauthorized or committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a, and against the peace of this State, the Government and dignity of the same.

**COUNT 5                      SEXUAL ASSAULT                      2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on or about July 3, 2016 in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration with J. Doe 2, while J. Doe 2 was detained in a prison and the actor had supervisory or disciplinary power over J. Doe 2 by virtue of the actor's legal, professional, or occupational status, contrary to the provisions of N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**COUNT 6                      OFFICIAL MISCONDUCT                      2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on diverse dates between on or about August 1, 2016 and October 6, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did with purpose to obtain a benefit for himself or another commit acts relating to his office but constituting an unauthorized exercise of his official functions, to wit, engaging in sexual conduct with J. Doe 3, when the said actor was a corrections officer and such act was unauthorized or committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a, and against the peace of this State, the Government and dignity of the same.

**Indictment No. 17-01-00032-I**

**COUNT 7**

**CRIMINAL COERCION**

**3<sup>RD</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on diverse dates between on or about August 1, 2016 and October 6, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, with purpose to unlawfully restrict another's freedom of action to engage or refrain from engaging in conduct, did threatened J. Doe 3 with institutional disciplinary charges if J. Doe 3 did not undress, contrary to the provisions of N.J.S.A. 2C:13-5(a)(4), and against the peace of this State, the Government and dignity of the same.

**COUNT 8**

**CRIMINAL SEXUAL CONTACT**

**4<sup>TH</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on about or between August 1, 2016 and October 6, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual contact with J. Doe 3, specifically by having J. Doe 3 touch his intimate body part, for the purpose of sexually arousing or sexually gratifying himself or to humiliate or degrade the said victim, contrary to the provisions of N.J.S.A. 2C:14-3b, and N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**COUNT 9**

**OFFICIAL MISCONDUCT**

**2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on diverse dates between June 16, 2016 and August 18, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did with purpose to obtain a benefit for himself or another commit acts relating to his office but constituting an unauthorized exercise of his official functions, to wit, engaging in sexual conduct with an J. Doe 4, when the said actor was a corrections officer and such act was unauthorized or committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a, and against the peace of this State, the Government and dignity of the same.

**COUNT 10**

**SEXUAL ASSAULT**

**2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on about or between June 16, 2016 and August 18, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration with J. Doe 4, while J. Doe 4 was detained in a prison and the actor had supervisory or disciplinary power over J. Doe 4 by virtue of the actor's legal, professional, or occupational status, contrary to the provisions of N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**Indictment No. 17-01-00032-I**

**COUNT 11                    CRIMINAL SEXUAL CONTACT                    4<sup>TH</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on diverse dates between June 16, 2016 and August 18, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual contact with J. Doe 4, for the purpose of sexually arousing or sexually gratifying himself or to humiliate or degrade the said victim, specifically by having J. Doe 4 touch his intimate body part, contrary to the provisions of N.J.S.A. 2C:14-3b, and N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**COUNT 12                    CRIMINAL SEXUAL CONTACT                    4<sup>TH</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on diverse dates between June 16, 2016 and August 18, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual contact with J. Doe 4, for the purpose of sexually arousing or sexually gratifying himself or to humiliate or degrade the said victim, specifically by touching the intimate body parts of J. Doe 4, contrary to the provisions of N.J.S.A. 2C:14-3b, and N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**COUNT 13                    OFFICIAL MISCONDUCT                    2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on or about April 11, 2010, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did with purpose to obtain a benefit for himself or another commit acts relating to his office but constituting an unauthorized exercise of his official functions, to wit, engaging in sexual conduct with J. Doe 5, when the said actor was a corrections officer and such act was unauthorized or committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a, and against the peace of this State, the Government and dignity of the same.

**Indictment No. 17-01-00032-I**

**COUNT 14**

**SEXUAL ASSAULT**

**2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on or about April 11, 2010, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration with J. Doe 5, while J. Doe 5 was detained in a prison and the actor had supervisory or disciplinary power over J. Doe 5 by virtue of the actor's legal, professional, or occupational status, contrary to the provisions of N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

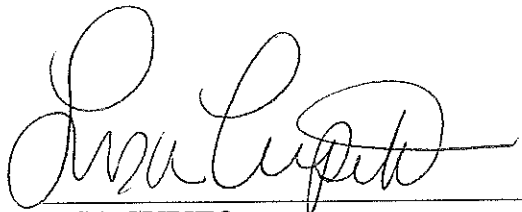
**COUNT 15**


**PATTERN OF OFFICIAL MISCONDUCT**

**2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Jason Mays, on about or between April 11, 2010 and October 6, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did commit two or more acts that violate the provisions of N.J.S.2C:30-2, specifically by engaging in sexual conduct with two or more inmates incarcerated at the Edna Mahan Correctional Facility identified as J. Doe 1, J. Doe 2, J. Doe 3, J. Doe 4 and J. Doe 5, contrary to the provisions of N.J.S.A. 2C:30-7a and against the peace of this State, the Government and dignity of the same.

ENDORSED AS A TRUE BILL:

  
\_\_\_\_\_  
LISA CUPITO  
Foreperson

  
\_\_\_\_\_  
ANTHONY P. KEARNS, III  
Hunterdon County Prosecutor

  
\_\_\_\_\_  
KELLY DANIELS  
Assistant Prosecutor

  
1/19/17

**NEW JERSEY SUPERIOR COURT**  
HUNTERDON COUNTY  
LAW DIVISION  
(CRIMINAL)

FILED/RECEIVED  
JAN 19 PM 1:39  
CASE MANAGEMENT  
CRIMINAL  
HUNTERDON COUNTY

**THE STATE OF NEW JERSEY**  
vs

**FILE NO. 16000717**  
**INDICTMENT NO. 17-01-00033-I**  
**STATED SESSION: NOVEMBER**  
**TERM: 2016**

**AHNWAR DIXON**

**Defendant**

**COUNT 1**

**OFFICIAL MISCONDUCT**

**2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths present that Ahnwar Dixon, on about or between June 1, 2016 and September 1, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did with purpose to obtain a benefit for himself or another commit acts relating to his office but constituting an unauthorized exercise of his official functions, to wit, engaging in sexual conduct with J. Doe 1, when the said actor was a corrections officer and such act was unauthorized or committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a, and against the peace of this State, the Government and dignity of the same.

**COUNT 2**

**SEXUAL ASSAULT**

**2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Ahnwar Dixon, on about or between June 1, 2016 and September 1, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration with J. Doe 1, while J. Doe 1 was detained in a prison and the actor had supervisory or disciplinary power over J. Doe 1 by virtue of the actor's legal, professional, or occupational status, contrary to the provisions of N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**Indictment No. 17-01-00033-I**

**COUNT 3                      CRIMINAL SEXUAL CONTACT                      4<sup>TH</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Ahnwar Dixon, on about or between June 1, 2016 and September 1, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual contact with J. Doe 1, for the purpose of sexually arousing or sexually gratifying himself or to humiliate or degrade the said victim, specifically by having J. Doe 1 touch his intimate body part, contrary to the provisions of N.J.S.A. 2C:14-3b, and N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**COUNT 4                      CRIMINAL SEXUAL CONTACT                      4<sup>TH</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Ahnwar Dixon, on about or between June 1, 2016 and September 1, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual contact with J. Doe 1, for the purpose of sexually arousing or sexually gratifying himself or to humiliate or degrade the said victim, specifically by touching the intimate body part of J. Doe 1, contrary to the provisions of N.J.S.A. 2C:14-3b, and N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**COUNT 5                      OFFICIAL MISCONDUCT                      2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Ahnwar Dixon, on about or between January 1, 2012 and November 30, 2013, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did with purpose to obtain a benefit for himself or another commit acts relating to his office but constituting an unauthorized exercise of his official functions, to wit, engaging in sexual conduct with J. Doe 2, when the said actor was a corrections officer and such act was unauthorized or committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a, and against the peace of this State, the Government and dignity of the same.

**COUNT 6                      CRIMINAL SEXUAL CONTACT                      4<sup>TH</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Ahnwar Dixon, on about or between January 1, 2012 and November 30, 2013, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual contact with J. Doe 2, for the purpose of sexually arousing or sexually gratifying himself or to humiliate or degrade the said victim, specifically by having J. Doe 2 touch his intimate body part, contrary to the provisions of N.J.S.A. 2C:14-3b, and N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

**Indictment No. 17-01-00033-I**

**COUNT 7**

**PATTERN OF OFFICIAL MISCONDUCT**

**2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that, Ahnwar Dixon, on about or between January 1, 2012 and September 1, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did commit two or more acts that violate the provisions of N.J.S.2C:30-2, specifically by engaging in sexual conduct with two or more inmates incarcerated at the Edna Mahan Correctional Facility identified as J. Doe 1 and J. Doe 2, contrary to the provisions of N.J.S.A. 2C:30-7a and against the peace of this State, the Government and dignity of the same.


ENDORSED AS A TRUE BILL:



ANTHONY P. KEARNS, III  
Hunterdon County Prosecutor



LISA CUPITO  
Foreperson



KELLY DANIELS  
Assistant Prosecutor

*aff*  
1/19/17



**NEW JERSEY SUPERIOR COURT**  
HUNTERDON COUNTY

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LAW DIVISION PM 1:39

(CRIMINAL)  
CASE MANAGEMENT  
CRIMINAL  
HUNTERDON COUNTY

**THE STATE OF NEW JERSEY**  
vs

**FILE NO. 16000639**  
**INDICTMENT NO. 17-01-00024-I**  
**STATED SESSION: NOVEMBER**  
**TERM: 2016**

**BRIAN Y. AMBROISE**

**Defendant**

**COUNT 1 OFFICIAL MISCONDUCT 2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths present that Brian Y. Ambroise, on or about September 25, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did with purpose to obtain a benefit for himself or another commit acts relating to his office but constituting an unauthorized exercise of his official functions, to wit, engaging in sexual conduct with an J. Doe, when the said actor was a corrections officer and such act was unauthorized or committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a, and against the peace of this State, the Government and dignity of the same.

**COUNT 2 SEXUAL ASSAULT 2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Brian Y. Ambroise, on or about September 25, 2016, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration with J. Doe, while J. Doe was detained in a prison and the actor had supervisory or disciplinary power over J. Doe by virtue of the actor's legal, professional, or occupational status, contrary to the provisions of N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

ENDORSED AS A TRUE BILL:

  
ANTHONY P. KEARNS, III  
Hunterdon County Prosecutor

  
LISA CUPITO  
Foreperson

  
KELLY DANIELS  
Assistant Prosecutor

atb  
1/19/17

**NEW JERSEY SUPERIOR COURT**

HUNTERDON COUNTY

LAW DIVISION

(CRIMINAL)

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2017 JAN 19 PM 1:39

CASE MANAGEMENT  
CRIMINAL  
HUNTERDON COUNTY

**THE STATE OF NEW JERSEY**

vs

**FILE NO. 16000136**  
**INDICTMENT NO. 17-01-00031-I**  
**STATED SESSION: NOVEMBER**  
**TERM: 2016**

**THOMAS SEGUINE**

**Defendant**

**COUNT 1**

**OFFICIAL MISCONDUCT**

**2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths present that Thomas Seguine, on about or between December 13, 2014 and February 28, 2015, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, did with purpose to obtain a benefit for himself or another commit acts relating to his office but constituting an unauthorized exercise of his official functions, to wit, engaging in sexual conduct with an J. Doe, when the said actor was a corrections officer and such act was unauthorized or committed in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a, and against the peace of this State, the Government and dignity of the same.

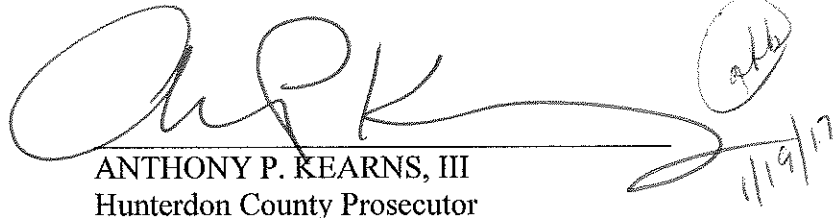
**COUNT 2**

**SEXUAL ASSAULT**

**2<sup>ND</sup> DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Hunterdon, upon their oaths further present that Thomas Seguine, on about or between December 13, 2014 and February 28, 2015, in the Township of Union, in the County of Hunterdon, and within the jurisdiction of this Court, knowingly did commit an act of sexual penetration with J. Doe, while J. Doe was detained in a prison and the actor had supervisory or disciplinary power over J. Doe by virtue of the actor's legal, professional, or occupational status, contrary to the provisions of N.J.S.A. 2C:14-2c(2), and against the peace of this State, the Government and dignity of the same.

ENDORSED AS A TRUE BILL:

  
ANTHONY P. KEARNS, III  
Hunterdon County Prosecutor

  
LISA CUPITO  
Foreperson

  
KELLY DANIELS  
Assistant Prosecutor