

INVASION OF PRIVACY - N.J.S.A. 2C:14-9(a)
BIAS INTIMIDATION – N.J.S.A. 2C:16-1(a)(1),(2) and/or (3)(b) and N.J.S.A. 2C:14-9(a)
ATTEMPTED INVASION OF PRIVACY – N.J.S.A. 2C:14-9a and N.J.S.A. 2C:5-1
TAMPERING WITH PHYSICAL EVIDENCE – N.J.S.A. 2C:28-6(1) and N.J.S.A. 2C:28-6(2)
HINDERING APPREHENSION OR PROSECUTION – N.J.S.A. 2C:29-3(b)(1), N.J.S.A. 2C:29-3b(3)
and N.J.S.A. 2C:29-3b(4)
WITNESS TAMPERING –
N.J.S.A. 2C:28-5(a)(1) and/or (2)

**FILE NO. 10002681
INDICTMENT NO.
SECOND GRAND JURY
MARCH 2011 STATED SESSION**

DHARUN RAVI

JULY TERM 2010

**COUNT 1
DEGREE**

INVASION OF PRIVACY

4TH

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths, present that, **DHARUN RAVI**, on or about September 19, 2010, in the Township of Piscataway, in the County of Middlesex, aforesaid, and within the jurisdiction of this Court, knowing that he was not licensed or privileged to do so, and under circumstances in which a reasonable person would know that another may expose intimate parts or engage in sexual penetration or sexual contact, did observe T.C. and/or M.B. without T.C. and/or M.B.'s consent and under circumstances in which a reasonable person would not expect to be observed; contrary to the provisions of N.J.S.A. 2C:14-9(a), and against the peace of this State, the Government and dignity of the same.

COUNT 2

BIAS INTIMIDATION

3RD DEGREE

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths, present that, **DHARUN RAVI**, on or about September 19, 2010, in the Township of Piscataway, in the County of Middlesex, aforesaid, and within the jurisdiction of this Court, did commit the offense of Invasion of Privacy, N.J.S.A. 2C:14-9(a), with the purpose to intimidate T.C. and/or M.B. because of sexual orientation, and/or knowing that the conduct constituting Invasion of Privacy would cause T.C. and/or M.B. to be intimidated because of sexual orientation and/or under circumstances that caused T.C. to be intimidated, and considering the manner in which the offense was committed, T.C. reasonably believed that he was selected to be the target of the offense because of sexual orientation; contrary to the provisions of N.J.S.A. 2C:16-1(a)(1), (2) and/or (3)(b), and of N.J.S.A. 2C:14-9(a), and against the peace of this State, the Government and dignity of the same.

COUNT 3**INVASION OF PRIVACY****3RD DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths, present that, **DHARUN RAVI**, on or about September 19, 2010, in the Township of Piscataway, in the County of Middlesex, aforesaid, and within the jurisdiction of this Court, knowing that he was not licensed or privileged to do so, disclosed a photograph, film, videotape, recording or other reproduction of the image of T.C. and/or M.B. whose intimate parts were exposed or who were engaged in an act of sexual penetration or sexual contact without the consent of T.C. and/or M.B.; contrary to the provisions of N.J.S.A. 2C:14-9(c), and against the peace of this State, the Government and dignity of the same.

COUNT 4**BIAS INTIMIDATION****2ND DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths, present that, **DHARUN RAVI**, on or about September 19, 2010, in the Township of Piscataway, in the County of Middlesex, aforesaid, and within the jurisdiction of this Court, did commit the offense of Invasion of Privacy, N.J.S.A. 2C:14-9(c), with the purpose to intimidate T.C. and/or M.B. because of sexual orientation, and/or knowing that the conduct constituting Invasion of Privacy would cause T.C. and/or M.B. to be intimidated because of sexual orientation and/or under circumstances that caused T.C. to be intimidated, and considering the manner in which the offense was committed, T.C. reasonably believed that he was selected to be the target of the offense because of sexual orientation; contrary to the provisions of N.J.S.A. 2C:16-1(a)(1), (2) and/or (3)(b), and of N.J.S.A. 2C:14-9(c), and against the peace of this State, the Government and dignity of the same.

COUNT 5**ATTEMPTED INVASION OF PRIVACY****4TH DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths, present that, **DHARUN RAVI**, on or about September 21, 2010, in the Township of Piscataway, in the County of Middlesex, aforesaid, and within the jurisdiction of this Court, knowing that he was not licensed or privileged to do so, and under circumstances in which a reasonable person would know that another may expose intimate parts or engage in sexual penetration or sexual contact, did attempt to observe T.C. and/or M.B. without T.C. and/or M.B.'s consent and under circumstances in which a reasonable person would not expect to be observed; contrary to the provisions of N.J.S.A. 2C:14-9a and N.J.S.A. 2C:5-1, and against the peace of this State, the Government and dignity of the same.

COUNT 6**BIAS INTIMIDATION****3RD DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths, present that, **DHARUN RAVI**, on or about September 21, 2010, in the Township of Piscataway, in the County of Middlesex, aforesaid, and within the jurisdiction of this Court, did attempt to commit the offense of Invasion of Privacy, N.J.S.A. 2C:14-9(a), with the purpose to intimidate T.C. and/or M.B. because of sexual orientation, and/or knowing that the conduct constituting Invasion of Privacy would cause T.C. and/or M.B. to be intimidated because of sexual orientation and/or under circumstances that caused T.C. to be intimidated, and considering the manner in which the offense was committed, T.C. reasonably believed that he was selected to be the target of the offense because of sexual orientation; contrary to the provisions of N.J.S.A. 2C:16-1(a)(1), (2) and/or (3)(b), and of N.J.S.A. 2C:14-9(a), and against the peace of this State, the Government and dignity of the same.

COUNT 7**ATTEMPTED INVASION OF PRIVACY****3RD DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths, present that, **DHARUN RAVI**, on or about September 21, 2010, in the Township of Piscataway, in the County of Middlesex, aforesaid, and within the jurisdiction of this Court, knowing that he was not licensed or privileged to do so, attempted to disclose a photograph, film, videotape, recording or other reproduction of the image of T.C. and/or M.B. whose intimate parts were exposed or who were engaged in an act of sexual penetration or sexual contact without the consent of T.C. and/or M.B.; contrary to the provisions of N.J.S.A. 2C:14-9(c) and N.J.S.A. 2C:5-1, and against the peace of this State, the Government and dignity of the same.

COUNT 8**BIAS INTIMIDATION****2ND DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths, present that, **DHARUN RAVI**, on or about September 21, 2010, in the Township of Piscataway, in the County of Middlesex, aforesaid, and within the jurisdiction of this Court, did attempt to commit the offense of Invasion of Privacy, N.J.S.A. 2C:14-9(a), with the purpose to intimidate T.C. and/or M.B. because of sexual orientation, and/or knowing that the conduct constituting Invasion of Privacy would cause T.C. and/or M.B. to be intimidated because of sexual orientation and/or under circumstances that caused T.C. to be intimidated, and considering the manner in which the offense was committed, T.C. reasonably believed that he was selected to be the target of the offense because of sexual orientation; contrary to the provisions of N.J.S.A. 2C:16-1(a)(1), (2) and/or (3)(b), and of N.J.S.A. 2C:14-9(c), and against the peace of this State, the Government and dignity of the same.

COUNT 9**TAMPERING WITH PHYSICAL EVIDENCE****4TH DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths present that **DHARUN RAVI**, on or about the 22nd day of September 2010, in the Township of Piscataway or in some other municipality within the County of Middlesex, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, did alter, destroy, conceal or remove an article, record, document or other thing of physical substance; to wit: a Tweet/post/message sent via Twitter with purpose to impair its verity and availability in such proceeding or investigation; contrary to the provisions of N.J.S.A. 28-6(1) and against the peace of this State, the Government and dignity of the same.

COUNT 10**TAMPERING WITH PHYSICAL EVIDENCE****4TH DEGREE**

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths present that **DHARUN RAVI**, on or about the 22nd day of September 2010, in the Township of Piscataway or in some other municipality within the County of Middlesex, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, did make, devise, prepare, present, offer or use any article, record, document or other thing of physical substance; to wit: a Tweet/post/message sent via Twitter, knowing it to be false and with purpose to mislead a public servant who was engaged in such proceeding or investigation; contrary to the provisions of N.J.S.A. 28-6(2) and against the peace of this State, the Government and dignity of the same.

COUNT 11 HINDERING APPREHENSION OR PROSECUTION 3RD DEGREE

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths present that **DHARUN RAVI**, on or about the 22nd day of September 2010, in the Township of Piscataway or some other municipality within the County of Middlesex, and within the jurisdiction of this Court, with purpose to hinder his own apprehension, investigation or prosecution for an offense, did suppress, by way of concealment or destruction, evidence of a crime or offense or tamper with a document or other source of information, regardless of its admissibility in evidence, which might aid in his discovery or apprehension or the lodging of a charge against him; contrary to the provisions of N.J.S.A. 2C:29-3(b)(1), and against the peace of this State, the Government and dignity of the same.

COUNT 12 HINDERING APPREHENSION OR PROSECUTION 3RD DEGREE

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths present that **DHARUN RAVI**, on or about the 23rd day of September 2010, in the Township of Plainsboro or some other municipality within the County of Middlesex, and within the jurisdiction of this Court, with purpose to hinder his own apprehension, investigation or prosecution for an offense, did prevent or obstruct by means of deception any witness or informant from providing testimony or information, regardless of its admissibility, which might aid in his discovery or apprehension or in the lodging of a charge against him; contrary to the provisions of N.J.S.A. 2C:29-3b(3), and against the peace of this State, the Government and dignity of the same.

COUNT 13 HINDERING APPREHENSION OR PROSECUTION 3RD DEGREE

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths present that **DHARUN RAVI**, on or about the 23rd day of September 2010, in the City of New Brunswick, in the County of Middlesex, and within the jurisdiction of this Court, did, with purpose to hinder his own apprehension, investigation or prosecution for an offense, give false information to a law enforcement officer; contrary to the provisions of N.J.S.A. 2C:29-3b(4), and against the peace of this State, the Government and dignity of the same.

COUNT 14 WITNESS TAMPERING 3RD DEGREE

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths present that **DHARUN RAVI**, on or about the 23rd day of September 2010, in the Township of Plainsboro or in some other municipality in the County of Middlesex, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, or had been instituted, did knowingly engage in conduct which a reasonable person would believe would cause a witness or informant to testify or inform falsely or withhold any testimony, information, document or thing; contrary to the provisions of N.J.S.A. 2C:28-5(a)(1) and/or (2) and against the peace of this State, the Government and dignity of the same.

COUNT 15

TAMPERING WITH PHYSICAL EVIDENCE

4TH DEGREE

The Grand Jurors of the State of New Jersey, for the County of Middlesex, upon their oaths present that **DHARUN RAVI**, on or between the 19th day of September 2010 and the 23rd day of September 2010, in the Townships of Piscataway and/or Plainsboro or in some other municipality within the County of Middlesex, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, did with purpose to impair its verity or availability in such proceeding or investigation, alter, destroy, conceal or remove an article, record, document or other thing of physical substance; to wit, text messages sent by defendant to certain witnesses and received from certain witnesses regarding events related to this matter; contrary to the provisions of N.J.S.A. 28-6(1) and against the peace of this State, the Government and dignity of the same.

TRUE BILL

County Prosecutor

Foreperson

Assistant Prosecutor