

BRADLEY D. BILLHIMER
Ocean County Prosecutor

ANTHONY U. CARRINGTON
Chief of Detectives



MICHAEL T. NOLAN, JR.
First Assistant Prosecutor

MICHELLE ARMSTRONG
Deputy First Assistant Prosecutor

OFFICE OF THE PROSECUTOR

119 Hooper Avenue
P.O. Box 2191
Toms River, New Jersey 08754-2191
732-929-2027
www.OCPONJ.gov

January 24, 2025

Sean Nelson Boero

Via OPRA Machine: opra+request-70654-4477759a@requests.opramachine.com

Re: Open Public Records Act (OPRA) Request
OCPO Case# 22000482 – Zachary Slater

Dear Mr. Boero:

Enclosed please find the Complaint Warrant, Affidavit of Probable Cause and Appendix A pursuant to your request made under the New Jersey Open Public Records Act (OPRA). Personal identifying information has been redacted pursuant to N.J.S.A. 47:1A-1.1, et seq.

If I can be of further assistance, please do not hesitate to contact me.

Yours very truly,
Dina R. Khajezadeh
Dina R. Khajezadeh
Assistant Prosecutor

DRK/ec

Enclosures

COMPLAINT - WARRANT

COMPLAINT NUMBER

1507**W****2022****000161**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

TOMS RIVER MUNICIPAL COURT
255 OAK AVENUE
TOMS RIVER NJ 08753-0000
732-797-3914 COUNTY OF: **OCEAN**

of CHARGES **2** CO-DEFTS **0** POLICE CASE # **21-42492**

COMPLAINANT **DET. G. BORG**
NAME: **POB1876/2550AKAVE**
ATTN WARRANTS
TOMS RIVER NJ 08753

THE STATE OF NEW JERSEY**VS.****ZACHARY M SLATER**

ADDRESS: **309 IRISH LANE**

ABERDEEN**MD 21001-0000****DEFENDANT INFORMATION**

SEX: **M** EYE COLOR: **BROWN** DOB: **1989**
DRIVER'S LIC. # **[REDACTED]** DL STATE: **MD**
SOCIAL SECURITY # **[REDACTED]** SBI #: **707379E**
TELEPHONE # **[REDACTED]** (C)
LIVSCAN PCN #: **150703016853**

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 04/24/2013 in **TOMS RIVER TWP**, **OCEAN** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, THE DEFENDANT DID ENGAGE IN ORAL SEX, SPECIFICALLY CUNILINGUS AND FELLATIO, WITH THE VICTIM **[REDACTED]**, WITH A DATE OF BIRTH OF **[REDACTED]** WHILE **[REDACTED]** WAS BETWEEN THE AGES OF SIXTEEN AND EIGHTEEN, AND THE DEFENDANT WAS IN A POSITION TO ACT IN A SUPERVISORY ROLE OVER **[REDACTED]** IN VIOLATION OF 2C:14-2C(3)(B) A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, HAVING ASSUMED THE RESPONSIBILITY FOR THE CARE OF **[REDACTED]** A SIXTEEN-YEAR-OLD CHILD WITH A DATE OF BIRTH OF **[REDACTED]** DID ENGAGE IN SEXUAL CONDUCT WHICH IMPAIRED OR DEBAUCHED THE MORALS OF **[REDACTED]** SPECIFICALLY BY ENGAGING IN ORAL SEX WITH **[REDACTED]** WHILE **[REDACTED]** WAS BETWEEN THE AGES OF SIXTEEN AND EIGHTEEN, AND WHILE THE DEFENDANT WAS IN A SUPERVISORY ROLE, IN VIOLATION OF 2C:24-4A, A CRIME OF THE THIRD DEGREE.

In violation of:

Original Charge	1) 2C:14-2C(3)(B)	2) 2C:24-4A	3)
Amended Charge			

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: **DET. G. BORG** Date: **02/09/2022**

You will be notified of your **Central First Appearance/CJP** date to be held at the **Superior Court** in the county of **OCEAN** at the following address: **OCEAN SUPERIOR COURT**

120 HOOPER AVE
Date of Arrest: **02/08/2022** Appearance Date: **[REDACTED]** Time: **[REDACTED]** **TOMS RIVER NJ 08753-0000**
Phone: **732-504-0700**

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator _____ Date _____ Signature of Judge _____ Date _____

☒ Probable cause IS found for the issuance of this complaint. **ERIN LANGE JUDICIAL OFFICER** **02/09/2022**

Signature and Title of Judicial Officer Issuing Warrant

Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: _____ by: _____
(If different from judicial officer that issued warrant)

☐ Domestic Violence - Confidential ☐ Related Traffic Tickets or Other Complaints ☐ Serious Personal Injury/ Death Involved

Special conditions of release:

☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify): _____

ORIGINAL

COMPLAINT – WARRANT (Court Action)

COMPLAINT NUMBER

1507 **W** **2022** **000161**

COURT CODE PREFIX YEAR SEQUENCE NO.

STATE V.

ZACHARY M SLATER

FTA Ball Information		Date Bail Set: _____		Amount Bail Set: \$ _____ by: _____		☐ Bail Recog. Attached			
Released on Bail (✓)	R.O.R.	Committed Default	Committed w/o Bail	Place Committed: _____			Date Referred to County Prosecutor: _____		
Date of First Appearance: _____		☐ Advised of Rights by _____				Defendant Desires Counsel: ☐ Yes ☐ No			
Prosecuting Attorney Information				Defense Counsel Information					
Name: _____				Name: _____					
State	County	Municipal	Other	None	Retained	Public Def	Assigned	Waived	Other
Original Charge		1) 2C:14-2C(3)(B)		2) 2C:24-4A		3)			
Amended Charge									
Waiver Indt/Jury									
Plea/Date of Plea		Plea: _____ Date: _____		Plea: _____ Date: _____		Plea: _____ Date: _____			
Adjudication (* see code)		Finding Code: _____ Date: _____		Finding Code: _____ Date: _____		Finding Code: _____ Date: _____			
Jail Term		Jail time credit Susp. Imp		Jail time credit Susp. Imp		Jail time credit Susp. Imp			
Probation Term		Susp. Imp		Susp. Imp		Susp. Imp			
Cond. Discharge Term									
Community Service									
D/L Suspension Term									
Fines/Costs		Fines: _____ Costs: _____		Fines: _____ Costs: _____		Fines: _____ Costs: _____			
VCCB/SNSF		VCCB: _____ SNSF: _____		VCCB: _____ SNSF: _____		VCCB: _____ SNSF: _____			
DEDR/Lab Fee		DEDR: _____ LAB: _____		DEDR: _____ LAB: _____		DEDR: _____ LAB: _____			
CD Fee/Drug Ed Fnd		CD: _____ DAEF: _____		CD: _____ DAEF: _____		CD: _____ DAEF: _____			
DV Surch/Other Fees		DV: _____ Other: _____		DV: _____ Other: _____		DV: _____ Other: _____			
Restitution Beneficiary: _____									

Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes:

Related Traffic Tickets and Complaints:

* Finding Codes

- 1 – Guilty
- 2 – Not Guilty
- 3 – Dismissed – Other
- 4 – Guilty but Merged
- 5 – Dismissed-Rule
- 6 – Dismissed Lack of Prosecution
- 7 – Dismissed – Pros Motion/Vic Req
- 8 – Conditional Discharge
- D – Dismissed- Prosecutor Discretion
- M – Dismissed- Mediation
- P – Dismissed-Plea Agreement
- S – Disposed at Superior
- W – Dismissed-False ID

COMPLAINT - WARRANT (Court Action)

JUDGE'S SIGNATURE _____

DATE _____

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NJ/CDR2 1/1/2017

COMPLAINT - WARRANT

COMPLAINT NUMBER

1507 W 2022 000161

COURT CODE PREFIX YEAR SEQUENCE NO.

**TOMS RIVER MUNICIPAL COURT
255 OAK AVENUE
TOMS RIVER NJ 08753-0000
732-797-3914 COUNTY OF: OCEAN**

**# of CHARGES CO-DEFTS POLICE CASE #
2 21-42492**

**COMPLAINANT
NAME: DET. G. BORG**

THE STATE OF NEW JERSEY

VS.

ZACHARY M SLATER

ADDRESS: 309 IRISH LANE

ABERDEEN MD 21001-0000

**DEFENDANT INFORMATION
SEX: M EYE COLOR: BROWN DOB: [REDACTED] 1989
DRIVER'S LIC. # [REDACTED] DL STATE: MD
SOCIAL SECURITY #: [REDACTED] SBI #: 707379E
TELEPHONE #: [REDACTED] (C)
LIVSCAN PCN #: 150703016853**

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 04/24/2013 in **TOMS RIVER TWP**, **OCEAN** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, THE DEFENDANT DID ENGAGE IN ORAL SEX, SPECIFICALLY CUNILINGUS AND FELLATIO, WITH THE VICTIM [REDACTED] WITH A DATE OF BIRTH OF [REDACTED] WHILE [REDACTED] WAS BETWEEN THE AGES OF SIXTEEN AND EIGHTEEN, AND THE DEFENDANT WAS IN A POSITION TO ACT IN A SUPERVISORY ROLE OVER [REDACTED] IN VIOLATION OF 2C:14-2C(3) (B) A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, HAVING ASSUMED THE RESPONSIBILITY FOR THE CARE OF [REDACTED] A SIXTEEN-YEAR-OLD CHILD WITH A DATE OF BIRTH OF [REDACTED] DID ENGAGE IN SEXUAL CONDUCT WHICH IMPAIRED OR DEBAUCHED THE MORALS OF [REDACTED] SPECIFICALLY BY ENGAGING IN ORAL SEX WITH [REDACTED] WHILE [REDACTED] WAS BETWEEN THE AGES OF SIXTEEN AND EIGHTEEN, AND WHILE THE DEFENDANT WAS IN A SUPERVISORY ROLE, IN VIOLATION OF 2C:24-4A, A CRIME OF THE THIRD DEGREE.

In violation of:

Original Charge	1) 2C:14-2C(3) (B)	2) 2C:24-4A	3)
Amended Charge			

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment

Signed: **DET. G. BORG** Date: **02/09/2022**

You will be notified of your **Central First Appearance/CJP** date to be held at the **Superior Court** in the county of **OCEAN** at the following address: **OCEAN SUPERIOR COURT**
120 HOOPER AVE **TOMS RIVER NJ 08753-0000**
Date of Arrest: **02/08/2022** Appearance Date: Time: Phone: **732-504-0700**

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator Date Signature of Judge Date

☒ Probable cause IS found for the issuance of this complaint. **ERIN LANGE JUDICIAL OFFICER** **02/09/2022**
Signature and Title of Judicial Officer Issuing Warrant Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: _____ **by:** _____
(if different from judicial officer that issued warrant)

☐ Domestic Violence - Confidential ☐ Related Traffic Tickets or Other Complaints ☐ Serious Personal Injury/ Death Involved

Special conditions of release:
☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

COMPLAINT - WARRANT (DEFENDANT'S COPY)

COMMITMENT

COMPLAINT NUMBER

1507

W

2022

000161

COURT CODE

PREFIX

YEAR

SEQUENCE NO

TOMS RIVER MUNICIPAL COURT

255 OAK AVENUE

TOMS RIVER

NJ 08753-0000

732-797-3914

COUNTY OF: OCEAN

of CHARGES

2

CO-DEFTS

POLICE CASE #:

21-42492

COMPLAINANT

DET. G.

BORG

NAME:

POBX876/255OAKAVE

ATTN WARRANTS

TOMS RIVER

NJ 08753

THE STATE OF NEW JERSEY

VS.

ZACHARY M SLATER

ADDRESS:

309 IRISH LANE

ABERDEEN

MD 21001-0000

DEFENDANT INFORMATION

SEX: M EYE COLOR: BROWN

DOB: [REDACTED] 1989

DRIVER'S LIC. #:

DL STATE: MD

SOCIAL SECURITY #:

SBI #: 707379E

TELEPHONE #:

(c)

LIVSCAN PCN #: 150703016853

To any Law Enforcement Official of New Jersey, You are commanded to transport this defendant to the Warden of this county who is required to keep the defendant in custody until a release or detention decision is made.

	Offense	Aux Offense	Drug Code	Degree	Offense Description
1.	2C:14-2C(3)(B)			2	SEXUAL ASSAULT-
2.	2C:24-4A			3	ENDANGERING-ABU
3.					
4.					

Commitment Reason: Criminal Justice Reform

You will be notified of your Central First Appearance/CJP date to be held at the Superior Court

in the county of OCEAN

at the following address: OCEAN SUPERIOR COURT

120 HOOPER AVE

TOMS RIVER

NJ 08753-0000

Date of Arrest: 02/08/2022

Phone: 732-504-0700

ERIN LANGE JUDICIAL OFFICER

02/09/2022

Signature and Title of Judicial Officer Issuing Warrant

Date

COMMITMENT

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NJICR2 1/1/2017

Affidavit of Probable Cause

COMPLAINT NUMBER

1507**W****2022****000161**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

TOMS RIVER MUNICIPAL COURT**255 OAK AVENUE****TOMS RIVER****NJ 08753-0000****732-797-3914****COUNTY OF: OCEAN**

of CHARGES

2

CO-DEFTS

POLICE CASE #:

21-42492

COMPLAINANT

DET. G.**BORG**

NAME:

POBX876/255OAKAVE**ATTN WARRANTS****TOMS RIVER****NJ 08753****THE STATE OF NEW JERSEY****VS.****ZACHARY M SLATER**

ADDRESS:

309 IRISH LANE**ABERDEEN****MD 21001-0000**

DEFENDANT INFORMATION

SEX: M EYE COLOR: BROWN

DOB: [REDACTED] 1989

DRIVER'S LIC. #:

DL STATE: MD

SOCIAL SECURITY #:

SBI #: 707379E

TELEPHONE #:

(C)

LIVESCAN PCN #: 150703016853

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:
See Appendix A

Affidavit of Probable Cause**Page 5 of 7**

1/1/2017

Affidavit of Probable Cause

COMPLAINT NUMBER

1507**W****2022****000161**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

THE STATE OF NEW JERSEY**VS.****ZACHARY M SLATER**

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

3. If victim was injured, provide the extent of the injury:

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DET. G. BORG LAW ENFORCEMENT OFFICER

Date: 02/08/2022

Affidavit of Probable Cause**Page 6 of 7****1/1/2017**

Preliminary Law Enforcement Incident Report

COMPLAINT NUMBER

1507 W 2022 000161

COURT CODE PREFIX YEAR SEQUENCE NO.

TOMS RIVER MUNICIPAL COURT
255 OAK AVENUE
TOMS RIVER NJ 08753-0000
732-797-3914 COUNTY OF: OCEAN

of CHARGES CO-DEFTS POLICE CASE #:
2 21-42492

COMPLAINANT NAME: **DET. G. BORG**
POBX876/255OAKAVE
ATTN WARRANTS
TOMS RIVER NJ 08753

THE STATE OF NEW JERSEY

VS.

ZACHARY M SLATER

ADDRESS: **309 IRISH LANE**

ABERDEEN

MD 21001-0000

DEFENDANT INFORMATION

SEX: **M** EYE COLOR: **BROWN** DOB: **[REDACTED] 1989**
DRIVER'S LIC. #: **[REDACTED]** DL STATE: **MD**
SOCIAL SECURITY #: **[REDACTED]** SBI #: **707379E**
TELEPHONE #: **[REDACTED] (C)**
LIVESCAN PCN #: **150703016853**

Purpose: The Preliminary Law Enforcement Incident Report (PLEIR) is intended to document basic information known to the officer at the time of its preparation. It is recognized that additional relevant information will emerge as an investigation continues. The PLEIR shall be in addition to, not in lieu of, any regular police arrest, incident, or investigation reports. Note that the PLEIR is specific to each defendant charged in an investigation.

- The offense involved a sexual crime.
- The defendant was known to the victim as:
 •Other/Explain supervisor
- The case involves a consent search.

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: **DET. G. BORG LAW ENFORCEMENT OFFICER** Date: **02/09/2022**

Preliminary Law Enforcement Incident Report

Page 7 of 7

7/20/2018

On August 31, 2021, at approximately 0900 hours, this affiant spoke with Sergeant John Murphy, of the Ocean County Prosecutor's Office, Special Victims Unit, in reference to an allegation of a sexual assault. Sgt. Murphy advised this affiant that the incident had been reported directly to their office, and involved a former student at the Ocean County Vocational Technical School who had been engaged in a sexual relationship with the defendant. Sgt. Murphy further stated that the victim, [REDACTED] would be responding to his office on September 8, 2021, to provide a formal taped statement in reference to the incident.

On September 8, 2021, at approximately 0900 hours, this affiant responded to the Ocean County Prosecutor's Office, Special Victims Unit, 7 Hadley Avenue, Toms River, to assist Sgt. Murphy with the interview of [REDACTED]. During the interview, [REDACTED] advised that in September, 2011, [REDACTED] enrolled as a freshman student at the Ocean County Vocational Technical School, Performing Arts Academy, which was then located in Lakehurst, NJ. [REDACTED] indicated that in October of 2011, [REDACTED] met the defendant while working with the sound crew on a theatrical production. [REDACTED] related that the defendant was an Ocean County Vocational Technical School faculty member at the time of their meeting, and that the defendant was the supervisor for the sound crew, which involved several students, including [REDACTED]. [REDACTED] stated that [REDACTED] and the defendant developed a close friendship while working on the theatrical production together, and would flirt with one another at times while alone in the sound booth.

[REDACTED] related that after completing her freshman year, [REDACTED] left the Ocean County Vocational Technical School, Performing Arts Academy, and enrolled at Donovan Catholic High School in September of 2012. After spending a short period of time at Donovan Catholic, [REDACTED] advised that she left and re-enrolled at the Ocean County Vocational Technical School, Performing Arts Academy. [REDACTED] indicated that upon returning to the Performing Arts Academy, the defendant greeted her with a hug, and expressed to [REDACTED] how happy the defendant was that [REDACTED] had returned to the academy. [REDACTED] related that while the sound crew had already been selected for the upcoming theatrical production, the defendant was able to make some changes that enabled [REDACTED] to join the sound crew, where the defendant was again [REDACTED]'s direct supervisor. During the course of [REDACTED]'s sophomore year, [REDACTED] indicated that their friendship continued as they spent a considerable amount of time together, both before and after school. [REDACTED] advised that they would spend time together in the defendant's classroom prior to the start of the school day and again in the afternoons, as they worked on a school production. Furthermore, [REDACTED] related that [REDACTED] and the defendant would talk on the telephone outside of school hours for long periods of time, almost on a daily occurrence.

In May of 2013, [REDACTED] advised that the relationship with the defendant progressed romantically, to the point where they started spending time together at the defendant's residence, located at 1183 Silverton Road, Toms River, NJ. [REDACTED] related that on May 26, 2013, while at the defendant's residence, [REDACTED] and the defendant kissed each other for the first time. [REDACTED] indicated that the following weekend, at some point around June 1, 2013, [REDACTED]

and the defendant engaged in oral sex, which involved the defendant performing cunnilingus on [REDACTED]. As their relationship continued to evolve, [REDACTED] advised that [REDACTED] started to perform fellatio on the defendant. This continued on a regular basis, until [REDACTED] graduated from high school, and the relationship progressed to vaginal intercourse.

On February 8, 2022, [REDACTED] was supplied with recording equipment and did a controlled meet, which was monitored by law enforcement, including this affiant, with the defendant. During the meet, which took place at an undisclosed location, the defendant acknowledged performing oral sex on [REDACTED] while she was still a student at the school. Specifically, [REDACTED] stated "next you're going to tell me that we didn't do oral before I graduated" to which the defendant replied, "No I am not going to say that." The defendant also acknowledged during the conversation that the victim stayed at his residence one time after a school event.