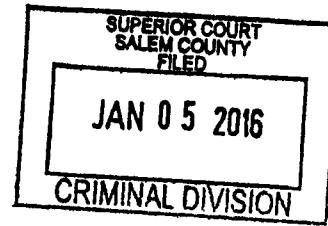


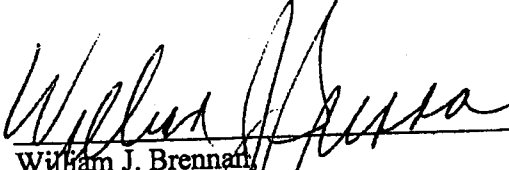
John T. Lenahan, County Prosecutor
Salem County Prosecutor's Office
Fenwick Building
87 Market Street, P.O. Box 462
Salem, New Jersey 08079
Telephone (856) 935-7510, EXT. 8333
Attorney for Plaintiff/State of New Jersey



By: William J. Brennan, First Assistant Prosecutor, Attorney Id: 002471994

THE STATE OF NEW JERSEY, Plaintiff.)	SUPERIOR COURT OF NEW JERSEY SALEM COUNTY LAW DIVISION-CRIMINAL PART
v.)	INDICTMENT NO.: 13-09-00524-1
ISAAC A. YOUNG Defendant.)	NOTICE OF MOTION TO AMEND SENTENCE TO INCLUDE ORDER OF FORFEITURE OF OFFICE UNDER <u>N.J.S.A. 2C:51-2</u>

PLEASE TAKE NOTICE that on the _____ day of _____, 2016, in the forenoon or as soon thereafter as counsel may be heard, the State of New Jersey, First Assistant Prosecutor William J. Brennan appearing, should make application to the Superior Court of New Jersey, Law Division, Criminal Part, Salem County Courthouse, that the Honorable Benjamin C. Telsey, P.J.Cr., issue an order of Forfeiture of Office in the above captioned matter pursuant to N.J.S.A. 2C:51-2.

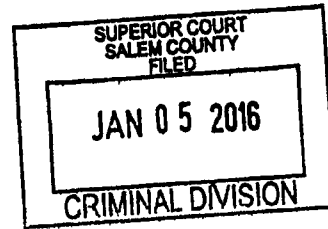


William J. Brennan,
First Assistant Prosecutor

1/5/16

Date

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Attorney for Plaintiff/State of New Jersey



By: William J. Brennan, First Assistant Prosecutor, Attorney Id: 002471994

THE STATE OF NEW JERSEY,
Plaintiff.

v.

ISAAC A. YOUNG
Defendant.

SUPERIOR COURT OF NEW JERSEY
SALEM COUNTY
LAW DIVISION-CRIMINAL PART

INDICTMENT NO.: 13-09-00524-I

MOTION TO AMEND SENTENCE TO
INCLUDE FORFEITURE OF OFFICE
UNDER N.J.S.A. 2C:51-2

Affidavit and Certification

William J. Brennan, hereby certifies:

1. I am an attorney licensed to practice in the State of New Jersey, currently serving as the First Assistant Prosecutor in the Salem County Prosecutor's Office.
2. I am entrusted in handling the above-captioned matter.
3. On or about September 4, 2014, Isaac Young was found guilty by a Salem County

Jury of the following:


- a) 4th Degree Unlawful Release of Report, 9:6-8.10B
- b) 4th Degree False Swearing, 2C:28-2A
- c) DP Hindering Prosecution, 2C:29-3B(4)

4. On November 7, 2014, Mr. Young was sentenced by the Honorable Timothy Farrell to 3 years probation on Unlawful Release of Reports, 3 years concurrent on Hindering Prosecution and 5 years concurrent with the other counts on the False Swearing charge. He was also sentenced to pay the appropriate fines.
5. At the time of his conviction, Mr. Young was suspended without pay from his position as Director of the Salem County Housing Authority.
6. At the time of his sentence, the Court did not issue an order of Forfeiture of Office.
7. Under N.J.S.A. 2C:51-2, entitled, "Forfeiture of Public Office, Position, or Employment," subsection *a* states, "a person holding any public office, position, or employment, elective or appointive, under the government of this State or any agency or political subdivision thereof, who is convicted of an offense shall forfeit such office, position or employment if: (1) he is convicted under the laws of this State of an offense involving dishonesty." Subsection *b* states "a court of this State shall enter an order of forfeiture pursuant to subsection *a*, (2) upon application of the county prosecutor."
8. Because Mr. Young was convicted of False Swearing, a crime of dishonestly, the State moves that an Order of Forfeiture be issued by the Court.
9. As per the Statue, the order shall be deemed to have taken effect on the date the person was found guilty.
10. By copy of this motion, I have notified Ronald Thompson, Esquire, who represented Mr. Young at sentencing, as well as Louis Barbone, Esquire, who represents Mr. Young presently.

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



William J. Brennan,
First Assistant Prosecutor


Date