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**SUPERIOR COURT
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL PART
State Grand Jury

Number SGJ 564-08-15

Superior Court
Docket Number **08-12-00276-S**

STATE OF NEW JERSEY)

v.)

~~LASHONDREA TUCKER~~)

ERICK STREETER)

INDICTMENT

DEBORAH RUFFIN)

ANGIE FEDRICK)

and)

LOUISE FEDRICK)

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

COUNT ONE

(Conspiracy - Second Degree)

LASHONDREA TUCKER

and

ERICK STREETER

who are named as defendants herein, and other persons who are

coconspirators and whose identities are known to the Grand Jurors but who are not named as defendants herein, between on or about September 22, 2003 and on or about March 23, 2004, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting and facilitating the commission of the crimes of Insurance Fraud, Theft by Deception and Falsifying Records, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes, or an attempt or solicitation to commit such crimes; or

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

1. Knowingly make, or cause to be made, five or more false, fictitious, fraudulent, or misleading statements of material fact in, or knowingly omit, or cause to be omitted, five or more material facts from any record, bill, claim or other document, in writing, electronically, orally or in any other form and attempt to submit, did submit, cause to be submitted, or attempted to cause to be submitted as part of, in support of, in opposition to or in connection with a claim for payment, reimbursement or other benefit pursuant to an insurance policy or from an insurance company, and the

aggregate pecuniary value obtained or sought to be obtained was at least \$1,000, contrary to the provisions of N.J.S.A. 2C:21-4.6.

2. Purposely obtain or attempt to obtain the property of another, in excess of \$75,000, by deception, contrary to the provisions of N.J.S.A. 2C:20-4.

3. Falsify a writing or record with purpose to deceive another, contrary to the provisions of N.J.S.A. 2C:21-4a.

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

(Insurance Fraud - Second Degree)

LASHONDREA TUCKER

and

ERICK STREETER

between on or about September 22, 2003 and on or about March 23, 2004, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly commit Insurance Fraud, in that the said LASHONDREA TUCKER and ERICK STREETER did knowingly make, or cause to be made, five or more false, fictitious, fraudulent or misleading statements of material fact in, or knowingly did omit, or cause to be omitted, five or more material facts from any record, bill, claim or other document, in writing, electronically, orally or in any other form, which the said LASHONDREA TUCKER and ERICK STREETER did attempt to submit, submit, cause to be submitted, or did attempt to cause to be submitted as part of, in support of, in opposition to or in connection with a claim for payment, reimbursement or other benefit pursuant to an insurance policy or from an insurance company, and the aggregate pecuniary value obtained or sought to be obtained was at least \$1,000, that is, the said LASHONDREA TUCKER and ERICK STREETER did submit Group Disability

Insurance Employees' Statements and Group Disability Insurance
Attending Physicians' Statements, as part of or in connection
with a claim for disability payments in the approximate amount of
\$94,100 pursuant to disability insurance policies issued by
Prudential Insurance Company, even though the policy holders had
not been ill, injured or hospitalized and medical services were
never provided, contrary to the provisions of N.J.S.A. 2C:21-4.6
and N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT THREE

(Theft By Deception - Second Degree)

LASHONDREA TUCKER

between on or about September 22, 2003 and on or about March 23, 2004, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain the property of another by deception, in an amount in excess of \$75,000, that is, the said LASHONDREA TUCKER purposely did obtain or attempt to obtain monies in the approximate amount of \$94,100 from Prudential Insurance Company by creating or reinforcing the false impression that PU, SS, FW and RW, whose identities are known to the Grand Jurors, were entitled to the proceeds of twenty-one (21) checks and two electronic fund transfers issued by the said LASHONDREA TUCKER in her capacity as an employee of Prudential Insurance Company, to wit, check #0842216934, check #0842217548, check #0842219015, check # 3250016490, check #3250054256, check #3250061923, check # 3250063676, check #3250115122, check #3250115123, check #3250115124, check #3250061041, check #3250069264, check #3250063677, check #3250065755, check #3250067373, check # 3250069971, check #3250069265, check # 3250070761, check #3250087756, check #3250087735, check #3250095467, and Electronic Fund Transfers to account# 11002762844 with Net Bank on March 1, 2004 and March 22, 2004, by issuing said checks and making the

aforementioned electronic fund transfers in her capacity as an employee with Prudential Insurance Company,

WHEREAS, IN TRUTH AND IN FACT, as the said LASHONDREA TUCKER well knew, she was not entitled to issue the aforementioned checks or make the aforementioned electronic fund transfers or share in the proceeds thereof, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Conspiracy - Third Degree)

ANGIE FEDRICK

DEBORAH RUFFIN

and

LOUISE FEDRICK

who are named as defendants herein, and other persons who are coconspirators and whose identities are known to the Grand Jurors, but who are not named as defendants herein, between on or about September 22, 2003 and on or about March 23, 2004, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting and facilitating the commission of the crimes of, Theft by Deception, Falsifying Records and Forgery, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes, or an attempt or solicitation to commit such crimes; or

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

1. Purposely obtain or attempt to obtain the property of another, in excess of \$500, by deception, contrary to the

provisions of N.J.S.A. 2C:20-4.

2. Falsify a writing or record with purpose to deceive another, contrary to the provisions of N.J.S.A. 2C:21-4a.

3. Utter a forged writing with a purpose to defraud or injure another, contrary to the provisions of N.J.S.A. 2C:21-1a(3).

The Grand Jurors aforesaid, upon their oaths, do further present that in furtherance of the said conspiracy, the following Overt Acts, among others, were committed:

OVERT ACTS

1. On or about December 30, 2003, at the City of Newark, in the County of Essex, the said DEBORAH RUFFIN, negotiated check #3250087756 in the approximate amount of \$3,000, issued by Prudential Insurance Company, made payable to FW, whose identity is known to the Grand Jurors.

2. On or about January 28, 2004, at the City of Newark, in the County of Essex, the said ANGIE FEDRICK and LOUISE FEDRICK, negotiated check #3250115122 in the approximate amount of \$3,000, issued by Prudential Insurance Company, made payable to PU, whose identity is known to the Grand Jurors.

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 FIVE

(Theft by Deception - Third Degree)

ERICK STREETER

LOUISE FEDRICK

and

ANGIE FEDRICK

between on or about December 15, 2003 and January 28, 2004, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain the property of another by deception, in an amount in excess of \$500, that is, the said ERICK STREETER, LOUISE FEDRICK and ANGIE FEDRICK did purposely obtain or attempt to obtain monies from Prudential Insurance Company in an approximate amount of \$9,300, by creating or reinforcing the false impression that the said ERICK STREETER, LOUISE FEDRICK and ANGIE FEDRICK were entitled to the proceeds of four (4) insurance claim checks issued by Lashondrea Tucker in her capacity as an employee of Prudential Insurance Company, to wit, check# 3250067373, check # 3250061923, check #3250063676, check # 3250115122,

WHEREAS, IN TRUTH AND IN FACT, as the said ERICK STREETER, LOUISE FEDRICK and ANGIE FEDRICK well knew, they were not

entitled to the proceeds thereof, contrary to the provisions of N.J.S.A. 2C:20-4, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft By Deception - Third Degree)

ERICK STREETER

and

DEBORAH RUFFIN

between on or about December 3, 2003 and on or about December 30, 2003, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposefully obtain the property of another by deception, in an amount in excess of \$500, that is, the said ERICK STREETER and DEBORAH RUFFIN did purposely obtain or attempt to obtain monies from Prudential Insurance Company in an approximate amount of \$9,300, by creating or reinforcing the false impression that the said ERICK STREETER and DEBORAH RUFFIN were entitled to the proceeds of four (4) insurance claim checks issued by Lashondrea Tucker in her capacity as an employee of Prudential Insurance Company, to wit, check #3250065775, check #3250069971, check #3250095467, and check #3250087756,

WHEREAS, IN TRUTH AND IN FACT, as the said ERICK STREETER and DEBORAH RUFFIN well knew, they were not entitled to the proceeds thereof, contrary to the provisions of N.J.S.A. 2C:20-4

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

COUNT SEVEN

(Computer Theft - Second Degree)

LASHONDREA TUCKER

between on or about September 22, 2003 and March 23, 2004, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while employed as a Disability Claims Manager at Prudential Insurance Company, did purposely or knowingly and without authorization, or in excess of authorization, access or attempt to access any data, data base, computer, computer storage medium, computer program, computer software, computer equipment, computer system or computer network of Prudential Insurance Company for the purpose of executing a scheme to defraud, or to obtain services, property, personal identifying information, or money from the owner of a computer, to wit, the Prudential Insurance Company, and the value of the services, property, personal identifying information, or money obtained or sought to be obtained was approximately \$94,100, contrary to the provisions of N.J.S.A.2C:20-25c, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Falsifying or Tampering with Records-Fourth Degree)

LASHONDREA TUCKER

on or about January 27, 2004, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did falsify or utter a writing or record, knowing that it contained a false statement or information, with the purpose to deceive or injure another, that is, the said LASHONDREA TUCKER did falsify a Group Disability Insurance Employee Statement to obtain disability benefits from Prudential Insurance Company, knowing that it contained a false statement or information, with purpose to deceive Prudential Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Uttering a Forged Instrument-Third Degree)

ANGIE FEDRICK

on or about January 28, 2004, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, or with knowledge that she was facilitating a fraud or injury to be perpetrated by another, did utter a writing which she knew to be forged, that is, the said ANGIE FEDRICK, with purpose to defraud or injure Prudential Insurance Company, did utter as true check number 325015122, issued by Prudential Insurance Company in the amount of \$3,000, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Uttering a Forged Instrument - Third Degree)

ANGIE FEDRICK

on or about December 23, 2003, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, or with knowledge that she was facilitating a fraud or injury to be perpetrated by another, did utter a writing which she knew to be forged, that is, the said ANGIE FEDRICK, with purpose to defraud or injure Prudential Insurance Company, did utter as true check number 3250063676, issued by Prudential Insurance Company in the amount of \$3,000, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Uttering a Forged Instrument - Third Degree)

ANGIE FEDRICK

on or about December 30, 2003, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, or with knowledge that she was facilitating a fraud or injury to be perpetrated by another, did utter a writing which she knew to be forged, that is, the said ANGIE FEDRICK, with purpose to defraud or injure Prudential Insurance Company, did utter as true check number 3250061923, issued by Prudential Insurance Company in the amount of \$3,000, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Forgery - Third Degree)

LOUISE FEDRICK

on or about December 30, 2003, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, or with knowledge that she was facilitating a fraud or injury to be perpetrated by another, did make, complete or execute a writing so that it purported to be the act of another who did not authorize that act or of a fictitious person, that is, the said LOUISE FEDRICK, with purpose to defraud or injure Prudential Insurance Company did endorse check number 3250061923 issued by Prudential Insurance Company, in the amount of \$3,000, so that it purported to be the act of PW, who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Forgery - Third Degree)

LOUISE FEDRICK

on or about January 28, 2004, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, or with knowledge that she was facilitating a fraud or injury to be perpetrated by another, did make, complete or execute a writing so that it purported to be the act of another who did not authorize that act or of a fictitious person, that is, the said LOUISE FEDRICK, with purpose to defraud or injure Prudential Insurance Company, did endorse check number 3250115122 issued by Prudential Insurance Company in the amount of \$3,000, so that it purported to be the act of PU, who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Forgery - Third Degree)

LOUISE FEDRICK

on or about December 23, 2003, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, or with knowledge that she was facilitating a fraud or injury to be perpetrated by another, did make, complete or execute a writing so that it purported to be the act of another who did not authorize that act or of a fictitious person, that is, the said LOUISE FEDRICK, with purpose to defraud or injure Prudential Insurance Company, did endorse check number 3250063676 issued by Prudential Insurance Company in the amount of \$3,000, so that it purported to be the act of PU, who did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Uttering a Forged Instrument - Third Degree)

DEBORAH RUFFIN

on or about December 30, 2003, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, or with knowledge that she was facilitating a fraud or injury to be perpetrated by another, did utter a writing which she knew to be forged, that is, the said DEBORAH RUFFIN, with purpose to defraud or injure Prudential Insurance Company, did utter as true check number 3250087756, issued by Prudential Insurance Company in the amount of \$3,000, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

