

FILED

SEP 23 2009

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ578-09-14

Superior Court

Docket Number

09-09-00228-S

STATE OF NEW JERSEY)

v.)

JOSE PUJOLS)

INDICTMENT

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

COUNT ONE

(Insurance Fraud - Second Degree)

JOSE PUJOLS

between on or about September 28, 2006 and on or about November 10, 2006, at the Town of Dover, in the County of Morris, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did knowingly commit Insurance Fraud, in that said JOSE PUJOLS, did knowingly commit, or solicit, aid, agree, or attempt to aid another in planning or committing five or more acts of insurance fraud, and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000.00, in that the said JOSE PUJOLS did knowingly make, or cause to be made, false, fictitious, fraudulent or misleading statements of material fact in, or did knowingly cause material facts to be omitted from any record,

bill, claim, or other document, in writing, electronically, orally, or in any other form, that a person did attempt to submit, submit, cause to be submitted or did attempt to cause to be submitted as part of, in support of, or in connection with, a claim for payment, reimbursement or other benefit under an insurance policy, or from an insurance company; that is the said JOSE PUJOLS did knowingly commit, or solicit, aid, agree, or attempt to aid another in planning or committing five or more acts of insurance fraud, and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000.00, in that the said JOSE PUJOLS did knowingly make, or cause to be made, false, fictitious, fraudulent or misleading statements of material fact in an insurance claim that the said JOSE PUJOLS did submit or caused to be submitted for payment under an insurance policy with Geico Insurance Company for loss by theft, alleging the 2000 blue Honda Accord, NJ Registration PSV 30Z, owned by the said JOSE PUJOLS, had been stolen; even though said automobile had not been stolen, by submitting the following false statements:

- 1) A police report filed by the said JOSE PUJOLS with the Paterson Police Department, on September 30, alleging the theft of the car and stating that the said JOSE PUJOLS last saw the 2000 blue Honda Accord in front of his house in Paterson at 8:45 p.m. on September 29, 2006 and that he discovered it missing at approximately 9:00 a.m. on the morning of September 30, 2006, when

in truth and in fact, the vehicle had not been stolen but had been purchased as part of an undercover law enforcement operation at approximately 1:30 pm on September 28, 2006 at the Town of Dover, New Jersey;

2) A report made to Geico Insurance Company telephonically by the said JOSE PUJOLS on at 12:15 p.m. on September 30, 2006 alleging that his car had been stolen and he had reported the theft to the Paterson Police Department, when in truth and in fact the vehicle had not been stolen but had been purchased as part of an undercover law enforcement operation at approximately 1:30 p.m. on September 28, 2006 at the Town of Dover, New Jersey;

3) An Affidavit of Theft made to Geico Insurance Company by the said JOSE PUJOLS on October 17, 2006 alleging the theft of the car and stating that he last saw the 2000 blue Honda Accord in front of his house in Paterson at 10:45 p.m. in the evening of September 29, 2006, when in truth and in fact, the vehicle had not been stolen but had been purchased as part of an undercover law enforcement operation at approximately 1:30 p.m. on September 28, 2006 at the Town of Dover, New Jersey;

4) An Affidavit of Theft made to Geico Insurance Company by the said JOSE PUJOLS on October 17, 2006 alleging theft of personal items and baseball equipment inside the car for which he later received insurance proceeds of an additional \$200.00, when in truth and in fact, neither his personal items nor the vehicle had been

stolen and;

5) A taped telephonic interview by a representative of Geico Insurance Company made on October 23, 2006 in which the said JOSE PUJOLS stated that he had parked the 2000 blue Honda Accord in front of his house in Paterson at 10:45 p.m. in the evening of September 29, 2006 and that he discovered the vehicle missing the following morning at about 9:00 a.m. on September 30, 2006, when in truth and in fact, the vehicle had not been stolen but had been purchased as part of an undercover law enforcement operation at approximately 1:30 p.m. on September 28, 2006 at the Town of Dover, New Jersey;

6) A taped telephonic interview by a representative of Geico Insurance Company made on October 23, 2006 in which the said JOSE PUJOLS stated that personal items and baseball equipment had been stolen along with the car for which he later received insurance proceeds of an additional \$200.00, when in truth and in fact, neither his personal items nor the vehicle had been stolen.

All contrary to the provisions of N.J.S.A. 2C:21-4.6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Third Degree)

JOSE PUJOLS

between on or about September 28, 2006 and on or about November 10, 2006, at the Town of Dover, in the County of Morris, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in excess of \$500; that is the said JOSE PUJOLS did purposely obtain property from Geico Insurance Company in the amount of \$8,265 by creating or reinforcing a false impression that his 2000 blue Honda Accord had been stolen;

WHEREAS, IN TRUTH AND IN FACT, as the said JOSE PUJOLS well knew, the car had not been stolen; contrary to the provisions of N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Fourth Degree)

JOSE PUJOLS

between on or about September 28, 2006 and on or about November 26, 2006, at the Town of Dover, in the County of Morris, at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in the amount of at least \$200; that is the said JOSE PUJOLS did purposely obtain property from Geico Insurance Company in the amount of \$200 by creating or reinforcing a false impression that personal items had been stolen;

WHEREAS, IN TRUTH AND IN FACT, as the said JOSE PUJOLS well knew, his personal items had not been stolen; contrary to the provisions of N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Tampering With Public Records or Information - Third Degree)

JOSE PUJOLS

on or about September 30, 2006 at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in a record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said JOSE PUJOLS, knowing the same to be false, did report to the Paterson Police Department that his 2000 blue Honda Accord had been stolen, when in truth and in fact, his car had not been stolen, contrary to the provisions of N.J.S.A. 2C:28-7a(1) and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Falsifying Records - Fourth Degree)

JOSE PUJOLS

on or about October 17, 2006 at the City of Paterson, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, did utter a writing or record knowing that it contained false statements or information, with purpose to deceive another or to conceal a wrongdoing; that is, the said JOSE PUJOLS did utter an Affidavit of Theft to the Geico Insurance Company stating that his 2000 blue Honda Accord and personal items had been stolen, knowing that the said Affidavit contained false statements and information, with purpose to deceive Geico Insurance Company contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.



Riza Dagli
Acting Insurance Fraud Prosecutor
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 9/23/09

FILED

SEP 23 2009

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ578-09-14
Superior Court
Docket Number 09-09-00228-S

STATE OF NEW JERSEY)

v.)

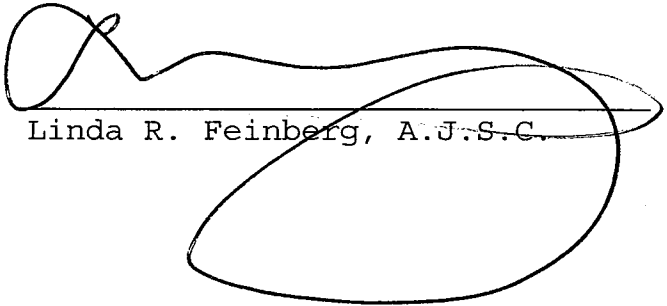
JOSE PUJOLS)

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 23rd day of September, 2009, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Morris be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Morris for filing.


Linda R. Feinberg, A.J.S.C.

FILED

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**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ578-09-12
Superior Court
Docket Number 09-09-00227-S

STATE OF NEW JERSEY)
v.)
MARK P. MCCAFFREY)

INDICTMENT

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

COUNT ONE

(Insurance Fraud - Third Degree)

MARK P. MCCAFFREY

between on or about September 5, 2006 and on or about November 21, 2006, at the Town of Dover and at the Township of Roxbury, both in the County of Morris, elsewhere, and within the jurisdiction of this Court, did knowingly commit Insurance Fraud, in that said MARK P. MCCAFFREY knowingly did make, or did cause to be made, false, fictitious, fraudulent or misleading statements of material fact in, or knowingly did cause a material fact to be omitted from any record, bill, claim, or other document, in writing, electronically, orally, or in any other form, which said MARK P. MCCAFFREY did attempt to submit, submit, cause to be submitted or did attempt to cause to be submitted as part of, in support of, or

in connection with, a claim for payment, reimbursement or other benefit under an insurance policy, or from an insurance company; that is the said MARK P. MCCAFFREY did knowingly make, or cause to be made, false, fictitious, fraudulent or misleading statements of material fact in an insurance claim that the said MARK P. MCCAFFREY did submit or caused to be submitted for payment under an insurance policy with Geico Insurance Company for loss by theft, alleging the 1999 gold Lincoln Navigator, NJ Registration SUY 25F, purchased by the said MARK P. MCCAFFREY, from James Toyota, Flemington, New Jersey had been stolen; even though said automobile had not been stolen, contrary to the provisions of N.J.S.A. 2C:21-4.6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Third Degree)

MARK P. MCCAFFREY

between on or about September 5, 2006 and on or about November 21, 2006, at the Town of Dover and at the Township of Roxbury, both in the County of Morris, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in excess of \$500; that is the said MARK P. MCCAFFREY did purposely obtain property from Geico Insurance Company in the approximate amount of \$13,000 by creating or reinforcing a false impression that his 1999 gold Lincoln Navigator had been stolen;

WHEREAS, IN TRUTH AND IN FACT, as the said MARK P. MCCAFFREY well knew, the car had not been stolen; contrary to the provisions of N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Tampering With Public Records or Information - Third Degree)

MARK P. MCCAFFREY

on or about September 9, 2006, at the Township of Roxbury, in the County of Morris, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in a record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said MARK P. MCCAFFREY, knowing the same to be false, did report to the Roxbury Police Department that his 1999 gold Lincoln Navigator had been stolen, when in truth and in fact, his car had not been stolen, contrary to the provisions of N.J.S.A. 2C:28-7a(1) and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Falsifying Records - Fourth Degree)

MARK P. MCCAFFREY

on or about September 24, 2006 at the Township of Roxbury, at the County of Morris, elsewhere, and within the jurisdiction of this Court, did utter a writing or record knowing that it contained false statements or information, with purpose to deceive another or to conceal a wrongdoing; that is, the said MARK P. MCCAFFREY did utter an Affidavit of Vehicle Theft to the Geico Insurance Company stating that the 1999 gold Lincoln Navigator purchased by the said MARK P. MCCAFFREY from James Toyota, of Flemington, New Jersey had been stolen, knowing that the said Affidavit contained false statements or information, with purpose to deceive the Geico Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-4, and against the peace of this State, the government and dignity of the same.



Riza Dagli
Acting Insurance Fraud Prosecutor
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 9/23/09

FILED

SEP 23 2009

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ578-09-12
Superior Court
Docket Number 09-09-00227-S

STATE OF NEW JERSEY)

v.)


MARK P. MCCAFFREY)

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 2nd day of September, 2009, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Morris be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Morris for filing.



Linda R. Feinberg, A.J.S.C.

FILED

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**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ578-09-11
Superior Court
Docket Number 09-09-00226-S

STATE OF NEW JERSEY)

v.)

NATIVIDAD LOPEZ)

INDICTMENT

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

COUNT ONE

(Insurance Fraud - Third Degree)

NATIVIDAD LOPEZ

between on or about August 23, 2006 and on or about November 20, 2006, at the Town of Dover, in the County of Morris, at the City of Passaic, in the County of Passaic, at the Township of Clark, in the County of Union, elsewhere, and within the jurisdiction of this Court, did knowingly commit Insurance Fraud, in that the said NATIVIDAD LOPEZ knowingly did make, or did cause to be made, false, fictitious, fraudulent or misleading statements of material fact in, or knowingly did cause a material fact to be omitted from any record, bill, claim, or other document, in writing, electronically, orally, or in any other form, which the said NATIVIDAD LOPEZ did attempt to submit, submit, cause to be submitted or did attempt to

cause to be submitted as part of, in support of, or in connection with, a claim for payment, reimbursement or other benefit under an insurance policy, or from an insurance company; that is the said NATIVIDAD LOPEZ did knowingly make, or cause to be made, false, fictitious, fraudulent or misleading statements of material fact in an insurance claim that the said NATIVIDAD LOPEZ did submit or caused to be submitted for payment under an insurance policy with IFA Insurance Company for loss by theft, alleging the 2000 white Jaguar S-Type, NJ Registration RTG 42P, purchased by the said NATIVIDAD LOPEZ and financed by Triad Financial Corporation, had been stolen; even though said automobile had not been stolen, contrary to the provisions of N.J.S.A. 2C:21-4.6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Third Degree)

NATIVIDAD LOPEZ

between on or about August 23, 2006 and on or about November 20, 2006, at the Town of Dover, in the County of Morris, at the City of Passaic, in the County of Passaic, at the Township of Clark, in the County of Union, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in excess of \$500; that is the said NATIVIDAD LOPEZ did purposely obtain property from IFA Insurance Company in the approximate amount of \$16,400 by creating or reinforcing a false impression that her 2000 white Jaguar S-Type had been stolen;

WHEREAS, IN TRUTH AND IN FACT, as the said NATIVIDAD LOPEZ well knew, her car had not been stolen, contrary to the provisions of N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Tampering With Public Records or Information - Third Degree)

NATIVIDAD LOPEZ

on or about September 2, 2006, at the City of Passaic, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in a record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the said NATIVIDAD LOPEZ, knowing the same to be false, did report to the Passaic Police Department that her 2000 white Jaguar S-Type had been stolen, when in truth and in fact, her car had not been stolen, contrary to the provisions of N.J.S.A. 2C:28-7a(1) and against the peace of this State, the government and dignity of the same.