FILED

MAY 21 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

| State Grand Ju | ry | |
|----------------|---------------|---|
| Number S | GJ637-13-11 | |
| Superior Court | 13-05-00097-5 | 5 |
| Docket Number | 13 03 00011 - | |

| STATE OF NEW JERSEY |) | |
|---------------------|---|------------|
| v. |) | INDICTMENT |
| NYONDOH L. BLAY |) | |
| aka |) | |
| JOHN BLAY |) | |
| and |) | |
| CARL JENKINS. |) | |

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

COUNT ONE

(Conspiracy - Second Degree)

NYONDOH L. BLAY

aka

JOHN BLAY

and

CARL JENKINS

between on or about January 31, 2013, and on or about February 1, 2013, at the City of Atlantic City, in the County of Atlantic, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of Theft by Deception, did agree with persons whose identities are both known and unknown to the Grand Jurors, who are named coconspirators and as defendants herein, that:

A. One or more of them would engage in the 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 the aforesaid crimes, that is:

Theft by Deception, in that one or more of them purposely would obtain property of another by deception, having a value of \$75,000 or more, contrary to <u>N.J.S.A.</u> 2C:20-4a.

All in violation of the provisions of <u>N.J.S.A.</u> 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Attempted Theft by Deception - Second Degree)

NYONDOH L. BLAY

aka

JOHN BLAY

and

CARL JENKINS

between on or about January 31, 2013, and on or about February 1, 2013, at the City of Atlantic City, in the County of Atlantic, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, purposely did attempt to obtain property from individuals whose identities are known to the Grand Jurors, having a value of \$75,000 or more, by deception, by creating or reinforcing the false impression that NYONDOH L. BLAY aka JOHN BLAY and CARL JENKINS possessed real U.S. currency dyed black and could extract the dye with chemicals, all contrary to the provisions of <u>N.J.S.A.</u> 2C:20-4a, <u>N.J.S.A.</u> 2C:5-1, and <u>N.J.S.A.</u> 2C:2-6, and against the peace of this State, the government and dignity of the same.

2. a. 1. stiller

Christine A. Hoffman Deputy Director Division of Criminal Justice

| A TRUE BILL: Rabe Cher | |
|---------------------------|------------|
| | Foreperson |
| Dated: | 2 |

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SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

| State Grand Jury Judge | State Grand Jury Number <u>SGJ637-13-11</u> Superior Court Docket Number <u>13-05</u> 00097-S |
|------------------------|--|
| TATE OF NEW JERSEY |) |
| v. |) |
| NYONDOH L. BLAY | ORDER OF VENUE) |
| also known as |) |
| JOHN BLAY |) |
| and |) |
| CARL JENKINS | |

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

IT IS ORDERED on this 21st day of May , 2013, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Camden 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 Camden for filing.

Thomas W. Sumners, Jr., J.S.C