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

Number: <u>639-13-19</u>

Superior Court

Docket Number: 13-09-00146_S

STATE OF NEW JERSEY)		FILED
v.)	INDICTMENT	SEP 12 2013 State Grand Jury Judge
MARY G. RAPKOWICZ)		Judge

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

COUNT ONE

(Theft by Deception - Third Degree)

MARY G. RAPKOWICZ

between on or about September 1, 2009 and on or about
August 31, 2011, in the Borough of Point Pleasant, in the
County of Monmouth, elsewhere, and within the jurisdiction
of this Court, purposely did obtain in excess of \$500, from
the New Jersey Department of Labor and Workforce
Development, by deception, that is by creating or
reinforcing a false impression that said MARY G. RAPKOWICZ
was unemployed and eligible to collect unemployment
insurance benefits from the State of New Jersey, to wit: by

submitting false information in her initial application for unemployment benefits in September 2009 and subsequent biweekly Claim for Benefits forms between October 2009 and August 2011, by failing to disclose her ownership and management of the Center for Dental and Medical Training, a limited liability company registered under the laws of the State of New Jersey, in the same, or by failing to disclose the hours worked and income generated in this capacity in her bi-weekly Claim for Benefits forms to the New Jersey Department of Labor and Workforce Development between October 2009 and August 2011, contrary to the provisions of N.J.S.A. 2C:20-4(a), and against the peace of this State and the government and dignity of the same.

COUNT TWO

(Tampering with Public Records or Information - Third Degree)

MARY G. RAPKOWICZ

between on or about September 1, 2009 and on or about August 31, 2011, in the Borough of Point Pleasant, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, with the purpose to defraud or injure, did make a false entry in a record, document or thing belonging to, 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 MARY G. RAPKOWICZ, knowing the same to be false, did make false entries by failing to disclose her ownership and management of the Center for Dental and Medical Training, a limited liability company registered under the laws of the State of New Jersey, and the hours worked and income generated in this capacity in her initial application for unemployment benefits and subsequent bi-weekly Claim for Benefits forms to the New Jersey Department of Labor and Workforce Development, contrary to the provisions of N.J.S.A. 2C:287(a), and against the peace of this State, the government and dignity of same.

COUNT THREE

(Unsworn Falsification to Authorities - Fourth Degree)

MARY G. RAPKOWICZ

between on or about September 1, 2009 and on or about

August 31, 2011, in the Borough of Point Pleasant, in the

County of Monmouth, elsewhere, and within the jurisdiction

of this Court, knowingly did make a written false statement

which she did not believe to be true on or pursuant to a

form, that is, New Jersey Department of Labor and Workforce

Development initial application or bi-weekly Claim for

Benefits form, said forms bearing notice, authorized by

law, to the effect that false statements made therein are

punishable, contrary to the provisions of N.J.S.A. 2C:28
3(a), and against the peace of this State, the government

and dignity of the same.

COUNT FOUR

(Falsifying or Tampering with Records - Fourth Degree)

MARY G. RAPKOWICZ

between on or about September 1, 2009 and on or about August 31, 2011, in the Borough of Point Pleasant, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, with purpose to deceive or injure another or to conceal a wrongdoing, knowing it to contain a false statement or information, did utter a writing or record, is, an application for unemployment benefits or subsequent bi-weekly Claim for Benefits forms to the New Jersey Department of Labor and Workforce Development, contrary to the provisions of N.J.S.A. 2C:21-4(a), and against the peace of this State, the government and dignity of same.

> Elie Honig, Director

Division of Criminal Justice

A TRUE BILL:

Foreperson Ahmas B Walker Dated: 9/12/13

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

	Superior Docket	Number <u>SGJ639-13-1</u> Court 13-09 Number	9-00116-5
STATE OF NEW JERSEY)		SED TEN
v.)	ODDED OF VENUE	State Grand I. 22013
MARY G. RAPKOWICZ)	ORDER OF VENUE	addury dud

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

IT IS ORDERED on this 12th day of September, 2013, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Monmouth 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 Monmouth for filing.

Mary C. Jacobson, A.J.S.C

Thomas W. Sumners, Jr