

**RECEIVED**

JUN 11 2013

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ637-13-13

Superior Court  
Docket Number

13-06-00109-S

STATE OF NEW JERSEY )

v. )

TODD P. HALPERN )

GEORGE J. HALPERN )

DAVID ALTMAN )

JACK B. CHESNER )

MIRIAM CHESNER )

MANUEL CRUZ )

GARRY D. LLOYD )

INDICTMENT

HENRY FORD )

DARIO GOMEZ )

AUGUSTIN GOMEZ )

**FILED**

ANDRES LOPEZ III )

JUN 19 2013

OSIRIS PEREZ )

State Grand Jury Judge

and )

EDGARD TORRES )

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

COUNT ONE

(Conspiracy - Second Degree)

TODD P. HALPERN

GEORGE J. HALPERN

DAVID ALTMAN

JACK B. CHESNER

MIRIAM CHESNER

MANUEL CRUZ

GARRY D. LLOYD

HENRY FORD

DARIO GOMEZ

AUGUSTIN GOMEZ

ANDRES LOPEZ III

OSIRIS PEREZ

and

EDGARD TORRES

between on or about October 26, 2008, and on or about May 12, 2012, at the City of Trenton, in the County of Mercer; at the Townships of Livingston and Millburn, and at the City of Newark, all in the County of Essex; at the Borough of Fanwood, at the Cities of Plainfield and Elizabeth, and at the Township of Union, all in the County of Union; at the Borough of Morris Plains, in the County of Morris; at the Cities of Union City and Jersey City, both in the County of Hudson; at the Township of

Washington, in the County of Gloucester; at the Township of Monroe, in the County of Middlesex; at the Township of Lyndhurst, in the County of Bergen; at the City of Kissimmee, in the State of Florida; and at the City of Las Vegas, in the State of Nevada, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of theft by deception and money laundering, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

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

1. Theft by Deception - one or more of them would purposely obtain property of another by deception, contrary to the provisions of N.J.S.A. 2C:20-4;

2. Money Laundering - one or more of them would engage in transactions involving property known or which a reasonable person would believe to be derived from criminal activity (1) with the intent to facilitate the criminal activity; or (2) knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(1) and 2C:21-25b(2)(a);

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

(Money Laundering - First Degree)

TODD P. HALPERN

and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about October 26, 2008, and on or about May 12, 2012, at the City of Trenton, in the County of Mercer; at the Townships of Livingston and Millburn, and the City of Newark, all in the County of Essex; at the Borough of Fanwood, at the Cities of Plainfield and Elizabeth, and at the Township of Union, all in the County of Union; at the Borough of Morris Plains, in the County of Morris; at the Cities of Union City and Jersey City, both in the County of Hudson; at the Township of Washington, in the County of Gloucester; at the Township of Monroe, in the County of Middlesex; at the Township of Lyndhurst, in the County of Bergen; at the City of Kissimmee, in the State of Florida; and at the City of Las Vegas, in the State of Nevada, elsewhere and within the jurisdiction of this Court, did commit the offense of money laundering, in that the said TODD P. HALPERN and others whose identities are known to the Grand Jurors, did engage in transactions involving property known to be derived from criminal activity, including theft by deception and identity theft, with a value in excess of \$500,000.00, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of

the property derived from the said criminal activity, and to facilitate the criminal activity; that is, TODD P. HALPERN and others whose identities are known to the Grand Jurors, did file, cause to be filed, or re-certified fraudulent New Jersey Unemployment Claims, received payments on said claims, negotiated checks associated with said claims, or caused payments from said claims to be deposited to bank accounts under their control, all contrary to the provisions of N.J.S.A. 2C:21-25b(1) and 2C:21-25b(2) (a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Identity Theft - Second Degree)

TODD P. HALPERN

between on or about October 26, 2008, and on or about May 12, 2012, at the City of Trenton, in the County of Mercer, at the City of Livingston, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for himself or another in an amount of \$75,000.00 or more, or to injure or defraud another, did impersonate five or more persons or assume five or more false identities and did acts in such assumed characters or false identities, that is, the said TODD P. HALPERN did impersonate or assume the identities of "V.A.," "L.D.," "P.W.," "S.D.," "J.D.," "S.E.," "F.G.," "J.G.," "M.M.," "J.M.," "S.M.," "F.W.," "L.B.," "A.C.," "R.L.," "S.I.," "D.T.," "E.P.," and "J.T.," and file for and collect unemployment insurance benefits in these names from the State of New Jersey with an aggregate value in excess of \$75,000.00, contrary to the provisions of N.J.S.A. 2C:21-17(a)(1), N.J.S.A. 2C:21-17(c)(3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Theft by Deception - Second Degree)

TODD P. HALPERN

and

DAVID ALTMAN

between on or about October 26, 2008, and on or about May 12, 2012, at the City of Trenton, in the County of Mercer; at the Townships of Livingston and Millburn, and at the City of Newark, all in the County of Essex; at the Borough of Fanwood, at the Cities of Plainfield and Elizabeth, and at the Township of Union, all in the County of Union; at the Borough of Morris Plains, in the County of Morris; at the Cities of Union City and Jersey City, both in the County of Hudson; at the Township of Washington, in the County of Gloucester; at the Township of Monroe, in the County of Middlesex; at the Township of Lyndhurst, in the County of Bergen; at the City of Kissimmee, in the State of Florida; and at the City of Las Vegas, in the State of Nevada, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of the State of New Jersey having an aggregate value of \$75,000.00 or more, by deception, that is, the said TODD P. HALPERN and DAVID ALTMAN purposely did obtain unemployment insurance benefits by filing, causing to be filed, or receiving payments on fraudulent applications for unemployment insurance benefits filed with the State of New Jersey, thereby

creating or reinforcing false impressions to the State of New Jersey that the individuals in whose names said claims were filed had earned wages from employers during certain time periods, and that they were entitled to collect unemployment insurance benefits from the State of New Jersey;

WHEREAS IN TRUTH AND IN FACT, as the said TODD P. HALPERN and DAVID ALTMAN well knew, said individuals were not employed by the employers named in said unemployment insurance applications during the time periods indicated, nor had they earned the wages indicated, and were thereby not entitled to collect said unemployment insurance benefits from the State of New Jersey, all contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT FIVE

(Money Laundering - Second Degree)

DAVID ALTMAN

between on or about September 19, 2010, and on or about March 28, 2012, at the City of Trenton, in the County of Mercer, at the Borough of Fanwood, in the County of Union, elsewhere and within the jurisdiction of this Court, did commit the offense of money laundering, in that the said DAVID ALTMAN did engage in transactions involving property known to be derived from criminal activity, including theft by deception, with a value in excess of \$75,000.00, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the said criminal activity, or to facilitate the criminal activity; that is, the said DAVID ALTMAN did file, cause to be filed, or re-certified fraudulent New Jersey Unemployment Claims, received payments on said claims, negotiated checks associated with said claims, caused payments from said claims to be deposited to a bank account under their control, all contrary to the provisions of N.J.S.A. 2C:21-25b(1) and 2C:21-25b(2)(a), 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)

JACK B. CHESNER

MIRIAM CHESNER

MANUEL CRUZ

HENRY FORD

DARIO GOMEZ

AUGUSTIN GOMEZ

GEORGE J. HALPERN

GARRY D. LLOYD

ANDRES LOPEZ III

OSIRIS PERES

and

EDGARD TORRES

between on or about April 19, 2009, and on or about February 5, 2012, at the City of Trenton, in the County of Mercer; at the Townships of Livingston and Millburn, and at the City of Newark, all in the County of Essex; at the Cities of Plainfield and Elizabeth, and at the Township of Union, all in the County of Union; at the Borough of Morris Plains, in the County of Morris; at the Cities of Union City and Jersey City, both in the County of Hudson; at the Township of Washington, in the County of Gloucester; at the Township of Monroe, in the County of Middlesex; at the Township of Lyndhurst, in the County of Bergen; at the City of Kissimmee, in the State of Florida; and at the City of Las Vegas, in the State of Nevada, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of

the State of New Jersey having an aggregate value of \$500 or more, by deception, that is, the said JACK B. CHESNER, MIRIAM CHESNER, MANUEL CRUZ, HENRY FORD, DARIO GOMEZ, AUGUSTIN GOMEZ, GEORGE J. HALPERN, GARRY D. LLOYD, ANDRES LOPEZ III, OSIRIS PEREZ, and EDGARD TORRES purposely did obtain unemployment insurance benefits by filing, causing to be filed, or receiving payments on applications for unemployment insurance benefits filed with the State of New Jersey, thereby creating or reinforcing false impressions to the State of New Jersey that they had earned wages from employers during certain time periods, and that they were entitled to collect unemployment insurance benefits from the State of New Jersey;

WHEREAS IN TRUTH AND IN FACT, as the said JACK B. CHESNER, MIRIAM CHESNER, MANUEL CRUZ, HENRY FORD, DARIO GOMEZ, AUGUSTIN GOMEZ, GEORGE J. HALPERN, GARRY D. LLOYD, ANDRES LOPEZ III, OSIRIS PEREZ, and EDGARD TORRES well knew, they had not been employed by the employers named in said unemployment insurance applications during the time periods indicated, nor had they earned the wages indicated, and were thereby not entitled to collect said unemployment insurance benefits from the State of New Jersey, all contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Money Laundering - Third Degree)

JACK B. CHESNER

MIRIAM CHESNER

MANUEL CRUZ

HENRY FORD

DARIO GOMEZ

AUGUSTIN GOMEZ

GEORGE J. HALPERN

GARRY D. LLOYD

ANDRES LOPEZ III

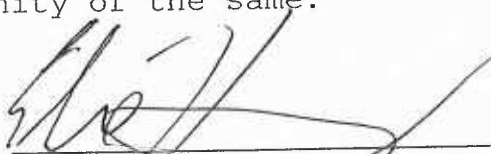
OSIRIS PERES

and

EDGARD TORRES

between on or about April 19, 2009, and on or about February 5, 2012, at the City of Trenton, in the County of Mercer; at the Townships of Livingston and Millburn, and at the City of Newark, all in the County of Essex; at the Cities of Plainfield and Elizabeth, and at the Township of Union, all in the County of Union; at the Borough of Morris Plains, in the County of Morris; at the Cities of Union City and Jersey City, both in the County of Hudson; at the Township of Washington, in the County of Gloucester; at the Township of Monroe, in the County of Middlesex; at the Township of Lyndhurst, in the County of Bergen; at the City of Kissimmee, in the State of Florida; and at the City of Las Vegas, in the State of Nevada, elsewhere and within the jurisdiction of this Court, did commit the offense of money laundering, in that the said JACK B. CHESNER, MIRIAM CHESNER,

MANUEL CRUZ, HENRY FORD, DARIO GOMEZ, AUGUSTIN GOMEZ, GEORGE J. HALPERN, GARRY D. LLOYD, ANDRES LOPEZ III, OSIRIS PEREZ, and EDGARD TORRES did engage in transactions involving property known to be derived from criminal activity, including theft by deception, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the said criminal activity, or to facilitate the criminal activity; that is, the said JACK B. CHESNER, MIRIAM CHESNER, MANUEL CRUZ, HENRY FORD, DARIO GOMEZ, AUGUSTIN GOMEZ, GEORGE J. HALPERN, GARRY D. LLOYD, ANDRES LOPEZ III, OSIRIS PEREZ, and EDGARD TORRES did file, cause to be filed, or re-certified fraudulent New Jersey Unemployment Claims, received payments on said claims, negotiated checks associated with said claims, or caused payments from said claims to be deposited to a bank account under their control, all contrary to the provisions of N.J.S.A. 2C:21-25b(1) and 2C:21-25b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Elie Honig, Director  
Division of Criminal Justice

A TRUE BILL:

Mary Kirkwood  
Deputy, Foreperson

Dated: 6/11/13

**RECEIVED**

JUN 11 2013

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

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STATE OF NEW JERSEY )

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TODD P. HALPERN )

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AUGUSTIN GOMEZ )

ANDRES LOPEZ III )

OSIRIS PEREZ )

and )

EDGARD TORRES )

**FILED**

JUN 19 2013

State Grand Jury Judge

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 11<sup>th</sup> day of June, 2013, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer 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 Mercer for filing.

  
Pedro J. Jimenez, Jr. J.S.C.