

FILED

JUN 4 - 2014

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ653-14-11

Superior Court

Docket Number

14-06-00070-S

STATE OF NEW JERSEY

)

v.

)

INDICTMENT

STEVEN SHORE and

)

MICHELE YORGAN

)

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

COUNT ONE

(Insurance Fraud - Second Degree)

Between on or about October 3, 2012 and on or about December 19, 2012, at the Township of Pennsauken, in the County of Camden, and elsewhere, all within the jurisdiction of this Court,

STEVEN SHORE

did commit insurance fraud by knowingly committing five or more acts of insurance fraud with the aggregate pecuniary benefit obtained or sought to be obtained being at least \$1,000.00; that is, the said STEVEN SHORE 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 material facts from any records, bills, claims, or other documents, in writing, electronically, orally, or in any other form as set forth below, that is the said STEVEN SHORE did attempt to submit, submitted, caused to be submitted, or did attempt to cause to be submitted as part of, in support of, or in connection with claims for payment, reimbursement, or other benefit pursuant to an insurance policy or from an insurance company, and the aggregate value of the property, services, or benefits the said STEVEN SHORE wrongfully obtained or sought to obtain was at least \$1,000.00; specifically, on five or more occasions, the said STEVEN SHORE knowingly made, or caused to be made false, fictitious, fraudulent, or misleading statements of material fact and / or knowingly did omit or caused to be omitted material facts, as part of, in support of, or in connection with claims for payment in the total amount of approximately \$68,220.75, hereinafter referred to as the "claim", for an allegedly stolen 2013 Porsche Cayenne bearing a VIN# ending in 03322, hereinafter referred to as "Porsche #1", purportedly stolen on or about November 28, 2012, pursuant to an automobile insurance policy ending in 7740, hereinafter referred to as the "Policy", issued by Liberty Mutual Insurance Company, hereinafter referred to as "Liberty", as follows:

1. On or about October 4, 2012, the said STEVEN SHORE did purchase an insurance policy for Porsche #1 and the said STEVEN SHORE did tell a Liberty insurance representative that the said STEVEN SHORE possessed Porsche #1 and / or did knowingly omit to tell the insurance representative that he planned to file a false claim for Porsche #1, whereas, in truth and in fact, the said STEVEN SHORE well knew that he had shipped, or caused to be shipped, Porsche #1 to China on or about October 4, 2012, and thereby caused Liberty to provide insurance coverage for Porsche #1, in connection with or in furtherance of his scheme to file a false claim;

2. On or about November 28, 2012, the said STEVEN SHORE did tell a Liberty insurance representative that Porsche #1 had been stolen from outside his residence, whereas, in truth and in fact, the said STEVEN SHORE well knew that Porsche #1 was not stolen, and during the course of the same conversation he also knowingly omitted to tell the said representative that he had shipped, or caused to be shipped, Porsche #1 to China on or about October 4, 2012, causing the said representative to file the said STEVEN SHORE's claim with Liberty that Porsche #1 had been stolen;

3. On or about December 3, 2012, the said STEVEN SHORE did call a Liberty representative whose initials are C.H. and ask

for information in connection with the claim and during the course of the same conversation he also knowingly omitted to tell C.H. that Porsche #1 was not stolen and that Porsche #1 had been shipped, or caused to be shipped, to China on or about October 4, 2012, whereas, in truth and in fact, the said STEVEN SHORE well knew that Porsche #1 was not stolen, and thereby omitted material facts from and / or submitted false information to Liberty in connection with or in furtherance of his claim;

4. On or about December 5, 2012, the said STEVEN SHORE did call a Liberty representative whose initials are J.P. and did ask about the claim and during the course of the same conversation he also knowingly omitted to tell J.P. that Porsche #1 was not stolen and that Porsche #1 had been shipped, or caused to be shipped, to China on or about October 4, 2012, whereas, in truth and in fact, the said STEVEN SHORE well knew that Porsche #1 was not stolen, and thereby omitted material facts from and / or submitted false information to Liberty in connection with or in furtherance of his claim;

5. On or about December 6, 2012, the said STEVEN SHORE did call a Liberty representative whose initials are M.G. and discussed the necessary paperwork to settle the claim and during the course of the same conversation he also knowingly omitted to tell M.G. that Porsche #1 was not stolen and that Porsche #1 had

been shipped or caused to be shipped, to China on or about October 4, 2012, whereas, in truth and in fact, the said STEVEN SHORE well knew that Porsche #1 was not stolen, and thereby omitted material facts from and / or submitted false information to Liberty in connection with or in furtherance of his claim;

6. On or about December 6, 2012, the said STEVEN SHORE did fill out, sign, and submit an Automobile Theft Affidavit to Liberty in which the said STEVEN SHORE represented that he had discovered that Porsche #1 was stolen on November 28, 2012, whereas, in truth and in fact, the said STEVEN SHORE well knew that Porsche #1 was not stolen, and in the said Affidavit of Theft he also knowingly omitted to tell Liberty that Porsche #1 had been shipped or caused to be shipped, to China on or about October 4, 2012, and thereby omitted material facts from and / or submitted the said Affidavit of Theft to Liberty which contained false information in connection with or in furtherance of his claim;

7. On or about December 6, 2012, the said STEVEN SHORE did supply a receipt for the purchase of Porsche #1 from Porsche of Atlantic City to Liberty, thereby misrepresenting that he still had possession of Porsche #1 at the time of the alleged theft whereas, in truth and in fact, the said STEVEN SHORE well knew that Porsche #1 was not stolen, and thereby submitted the said

receipt to Liberty in connection with or in furtherance of his claim;

8. On or about December 11, 2012, the said STEVEN SHORE did call a Liberty representative whose initials are J.P. and advised the said representative that the said STEVEN SHORE had sent paperwork to Liberty and during the course of the same conversation he also knowingly omitted to tell the said J.P. that Porsche #1 was not stolen and that the said Porsche #1 had been shipped or caused to be shipped, to China on or about October 4, 2012, whereas, in truth and in fact, the said STEVEN SHORE well knew that the said Porsche #1 was not stolen, and thereby omitted material facts from and / or submitted false information to Liberty in connection with or in furtherance of his claim;

9. On or about December 13, 2012, the said STEVEN SHORE did call a Liberty representative whose initials are S.H. and discussed the status of the claim and during the course of the same conversation he also knowingly omitted to tell S.H. that Porsche #1 was not stolen and that Porsche #1 had been shipped or caused to be shipped, to China on or about October 4, 2012, whereas, in truth and in fact, STEVEN SHORE well knew that Porsche #1 was not stolen, and thereby omitted material facts

from and / or submitted false information to Liberty in connection with or in furtherance of his claim;

10. On or about December 14, 2012, the said STEVEN SHORE did call a Liberty representative whose initials are S.W. and discussed the status of his claim and during the course of the same conversation he also knowingly omitted to tell said representative that Porsche #1 was not stolen and that the said Porsche #1 had been shipped or caused to be shipped, to China on or about October 4, 2012, whereas, in truth and in fact, the said STEVEN SHORE well knew that the said Porsche #1 was not stolen, and thereby omitted material facts from and / or submitted false information to Liberty in connection with or in furtherance of his claim;

11. On or about December 17, 2012, Liberty representative S.W. did call the said STEVEN SHORE about a settlement offer of \$68,220.75 and the said STEVEN SHORE did accept that offer, whereas, in truth and in fact, the said STEVEN SHORE well knew that he was not entitled to that settlement because Porsche #1 had been shipped or caused to be shipped to China on or about October 4, 2012, and was not stolen, and during the course of the same conversation the said STEVEN SHORE did not tell Liberty that the said Porsche #1 was not stolen, and thereby omitted material facts from and / or submitted false information to

Liberty in connection with or in furtherance of his claim;
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)

Between on or about October 3, 2012 and on or about December 19, 2012, at the Township of Pennsauken, in the County of Camden, and elsewhere, all within the jurisdiction of this Court,

STEVEN SHORE

purposely did obtain the property of another in an amount greater than \$500.00 but less than \$75,000.00 by deception, that is, the said STEVEN SHORE purposely did obtain property in the amount of approximately \$68,220.75 from Liberty Mutual Insurance Company, hereinafter referred to as "Liberty", by creating and/or reinforcing a false impression with Liberty that a 2013 Porsche Cayenne bearing a VIN# ending in 03322, hereinafter referred to as "Porsche #1," which was covered by a Liberty automobile insurance policy ending in 97740, was stolen on or about November 28, 2012, whereas, in truth and in fact, STEVEN SHORE well knew that Porsche #1 had been shipped or caused to be shipped to China on or about October 4, 2012 and that Porsche #1 was not stolen; contrary to the provisions of N.J.S.A. 2C:20-4a, and against the peace of this State, the government, and dignity of the same.

COUNT THREE

(Conspiracy - Second Degree)

Between on or about October 3, 2012 and on or about August 23, 2013, at the Townships of Pennsauken and Cherry Hill, in the County of Camden, and elsewhere, all within the jurisdiction of this Court,

STEVEN SHORE

and

MICHELE YORGAN,

who are named as defendants herein, did, with the purpose of promoting or facilitating the commission of the crimes of insurance fraud, theft by deception, and falsifying or tampering with records, agree that:

(a) One or more of them would knowingly engage in conduct which constitutes the aforementioned crimes or an attempt or solicitation to commit such crimes; or

(b) One or more of them would knowingly aid such other person or persons in the planning or commission of the aforementioned crimes or of an attempt or solicitation to commit such crimes;

that is Insurance Fraud, a second degree crime, in violation of N.J.S.A. 2C:21-4.6; Theft by Deception, a third degree crime, in violation of N.J.S.A. 2C:20-4; and Falsifying or Tampering with

Records, a fourth degree crime, in violation of N.J.S.A. 2C:21-4 and among the means by which the defendants did agree to carry out and then did carry out the conspiracy are as follows:

1. The said STEVEN SHORE asked the said MICHELE YORGAN to file a claim alleging a stolen vehicle, specifically a 2013 Porsche Cayenne bearing a VIN# ending in 04686, hereinafter referred to in this count as "Porsche #2," with Travelers Insurance Company, hereinafter referred to in this count as "Travelers";
2. At the request of the said STEVEN SHORE, on April 11, 2013, the said MICHELE YORGAN notified law enforcement authorities that Porsche #2 was stolen, whereas, in truth and in fact, the said MICHELE YORGAN well knew that she did not possess Porsche #2, that Porsche #2 was not stolen, and / or that Porsche #2 had been shipped or caused to be shipped to China on or about October 17, 2012;
3. Between on April 19, 2013 and on or about May 7, 2013, the said STEVEN SHORE and MICHELE YORGAN each separately met with a Travelers special investigator whose initials are B.D. and misrepresented that the said STEVEN SHORE sold Porsche #2 to the said MICHELE YORGAN on March 20, 2013;
4. The said STEVEN SHORE and / or MICHELE YORGAN falsified a New Jersey Motor Vehicle Commission title, alleging

Porsche #2 was a "gift";

5. The said STEVEN SHORE and / or MICHELE YORGAN falsified a contract stating that the said MICHELE YORGAN bought Porsche #2 from STEVEN SHORE for \$65,000;

contrary to 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 FOUR

(Insurance Fraud - Second Degree)

Between on or about October 17, 2012 and on or about August 21, 2013, at the Townships of Pennsauken and Cherry Hill, in the County of Camden, and elsewhere, all within the jurisdiction of this Court,

STEVEN SHORE

and

MICHELE YORGAN,

did commit insurance fraud by knowingly committing five or more acts of insurance fraud with the aggregate pecuniary benefit obtained or sought to be obtained being at least \$1,000.00; that is, the said STEVEN SHORE and MICHELE YORGAN 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 material facts from any records, bills, claims, or other documents, in writing, electronically, orally, or in any other form as set forth below, that is the said STEVEN SHORE and MICHELE YORGAN did attempt to submit, submitted, caused to be submitted, or did attempt to cause to be submitted as part of, in support of, or in connection with claims for payment, reimbursement, or other benefit pursuant to an insurance policy or from an insurance company, and the aggregate value of

the property, services, or benefits the said STEVEN SHORE and MICHELE YORGAN wrongfully obtained or sought to obtain was at least \$1,000.00; specifically, on five or more occasions, the said STEVEN SHORE and MICHELE YORGAN knowingly made, or caused to be made false, fictitious, fraudulent, or misleading statements of material fact and / or knowingly did omit or caused to be omitted material facts, as part of, in support of, or in connection with claims for payment in the total amount of approximately \$63,457.42 for a 2013 Porsche Cayenne bearing a VIN# ending in 04686, hereinafter referred to as "Porsche #2," purportedly stolen on or about April 10, 2013, pursuant to an automobile insurance policy ending in 57691, hereinafter referred to as the "Policy", issued by Travelers Insurance Company, hereinafter referred to in this count as "Travelers", as follows:

1. On or about March 20, 2013, the said MICHELE YORGAN did add Porsche #2 to her existing Travelers Policy, whereas, in truth and in fact, the said MICHELE YORGAN well knew that she did not possess Porsche #2, that Porsche #2 had not been stolen, and / or that Porsche #2 had been shipped or caused to be shipped to China on or about October 17, 2012, and thereby caused Travelers to provide coverage for Porsche #2, in connection with or in furtherance of the said MICHELE YORGAN's and the said STEVEN SHORE's plan to file a false claim;

2. On or about April 11, 2013, the said MICHELE YORGAN did tell a Travelers representative whose initials are L.B.D. that the said MICHELE YORGAN'S car had been stolen from outside her massage studio, whereas, in truth and in fact, the said MICHELE YORGAN well knew that she did not possess Porsche #2, that Porsche #2 had not been stolen, and / or that Porsche #2 had been shipped or caused to be shipped to China on or about October 17, 2012, and during the course of that conversation the said MICHELE YORGAN knowingly omitted to tell the said representative that she actually did not possess Porsche #2 and that Porsche #2 had not been stolen, and thereby caused the said representative to file a claim with Travelers on her behalf, in which the said representative represented to Travelers that Porsche #2 had been stolen;

3. On or about April 12, 2013, the said MICHELE YORGAN did speak with a Travelers insurance representative whose initials are L.B.D., and during the course of that conversation knowingly omitted to tell the said representative that she did not possess Porsche #2, whereas, in truth and in fact, the said MICHELE YORGAN well knew that she did not possess Porsche #2, that Porsche #2 had not been stolen, and / or that Porsche #2 had been shipped or caused to be shipped to China on or about October 17, 2012, and thereby caused the said representative to enter

information into the Travelers claim notes in connection with or in furtherance of her claim that Porsche #2 had been stolen;

4. On or about April 18, 2013 the said MICHELE YORGAN did fill out and submit an Affidavit of Theft to Travelers in which she misrepresented that she had purchased Porsche #2 from the said STEVEN SHORE on March 20, 2013 for \$65,000 and that it was stolen on April 10, 2013, whereas, in truth and in fact, the said MICHELE YORGAN well knew that she did not possess Porsche #2, that Porsche #2 had not been stolen, and / or that Porsche #2 had been shipped or caused to be shipped to China on or about October 17, 2012, and thereby caused B.D. to enter information into the Travelers claim notes in connection with or in furtherance of her claim that Porsche #2 had been stolen;

5. On or about April 19, 2013, the said MICHELE YORGAN did speak with a Travelers special investigator whose initials are B.D., and did misrepresent that she had bought Porsche #2 from the said STEVEN SHORE and that it was stolen from outside her massage studio on April 10, 2013 and during the course of that same conversation knowingly omitted to tell B.D. that she actually did not possess Porsche #2, whereas, in truth and in fact, the said MICHELE YORGAN well knew that she did not possess Porsche #2, that Porsche #2 had not been stolen, and / or that Porsche #2 had been shipped or caused to be shipped to China on

or about October 17, 2012, and thereby caused the said B.D. to enter information into the Travelers claim notes in connection with or in furtherance of her claim that Porsche #2 had been stolen;

6. On or about May 7, 2013, the said STEVEN SHORE did speak with a Travelers special investigator whose initials are B.D., and did misrepresent that the said MICHELE YORGAN had bought the Porsche #2 from himself for \$65,000 in cash and during the course of that same conversation knowingly omitted to tell B.D. that the said MICHELE YORGAN actually did not possess Porsche #2, whereas, in truth and in fact, the said STEVEN SHORE well knew that MICHELE YORGAN did not possess Porsche #2 and / or that Porsche #2 had been shipped or caused to be shipped to China on or about October 17, 2012, and thereby caused the said investigator to enter information into the Travelers claim notes in connection with or in furtherance of the said MICHELE YORGAN's claim that Porsche #2 had been stolen;

7. On or about August 21, 2013, the said MICHELE YORGAN did participate in an Examination Under Oath, in which she did make various misrepresentations about the theft of a 2013 Porsche Cayenne bearing a VIN# ending in 04686, when she did not believe those statements to be true, since in truth and in fact, the said MICHELE YORGAN well knew that she did not possess Porsche #2,

that Porsche #2 had not been stolen, and / or that Porsche #2 had been shipped or caused to be shipped to China on or about October 17, 2012, contrary to the provisions of N.J.S.A. 2C:21-4.6 and 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Attempted Theft by Deception - Third Degree)

Between on or about October 17, 2012 and on or about August 21, 2013, at the Townships of Pennsauken and Cherry Hill, in the County of Camden, and elsewhere, all within the jurisdiction of this Court,

STEVEN SHORE

and

MICHELE YORGAN

purposely did attempt to obtain the property of another in an amount greater than \$1,000.00 and less than \$75,000.00 by deception, that is, the said STEVEN SHORE and MICHELLE YORGAN purposely did attempt to obtain property in the amount of approximately \$63,457.42 from Travelers Insurance Company, hereinafter referred to in this count as "Travelers," by creating and/or reinforcing a false impression with Travelers that a 2013 Porsche Cayenne bearing a VIN# ending in 04686, hereinafter referred to in this count as "Porsche #2," which was covered by a Travelers insurance policy ending in 57691, was stolen on or about April 10, 2013, whereas, in truth and in fact, the said STEVEN SHORE and / or the said MICHELE YORGAN well knew that Porsche #2 had not been stolen on or about April 10, 2013; contrary to the provisions of N.J.S.A. 2C:20-4a, 2C:5-1 and

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

COUNT SIX

(Falsifying or Tampering with Records - Fourth Degree)

Between on or about March 20, 2013 and on or about April 4, 2013, at the Townships of Pennsauken and Cherry Hill, in the County of Camden, and elsewhere, all within the jurisdiction of this Court,

STEVEN SHORE

and

MICHELE YORGAN

knowingly did 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 STEVEN SHORE and MICHELE YORGAN did utter a contract of sale dated March 20, 2013 to Travelers Insurance Company, hereinafter referred to in this count as "Travelers," in connection with and / or in furtherance of a claim that a 2013 Porsche Cayenne bearing a VIN# ending in 04686, hereinafter referred to in this count as "Porsche #2," had been stolen, knowing that the contract of sale contained a false statement or information, specifically that the said STEVEN SHORE sold Porsche #2 to the said MICHELE YORGAN for \$65,000, with purpose to deceive or injure Travelers, contrary to the provisions of N.J.S.A. 2C:21-4a and 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT SEVEN

(False Swearing - Fourth Degree)

On or about August 21, 2013, at the Township of Haddon, in the County of Camden, and elsewhere, all within the jurisdiction of this Court,

MICHELE YORGAN,


did make a false statement during an Examination Under Oath when she did not believe the statement to be true; that is, the said MICHELE YORGAN did make false statements about the alleged theft of a 2013 Porsche Cayenne bearing a VIN# ending in 04686, hereinafter referred to in this count as "Porsche #2," when she did not believe those statements to be true, specifically including, but not limited to, statements that the said MICHELE YORGAN purchased Porsche #2 from STEVEN SHORE; that she possessed Porsche #2 on the date of the alleged theft; and that Porsche #2 was stolen, whereas in truth and in fact, the said MICHELE YORGAN well knew that she did not purchase Porsche #2 from STEVEN SHORE, she did not possess Porsche #2 on the date of the alleged theft, that Porsche #2 had not been stolen, and / or that Porsche #2 had been shipped or caused to be shipped to China on or about October 17, 2012;

contrary to the provisions of N.J.S.A. 2C:28-2a, and against the peace of this State, the government, and dignity of the same.

RONALD CHILLEMI
ACTING INSURANCE FRAUD PROSECUTOR
STATE OF NEW JERSEY

Mark Ondris DAG
BY: DAG Mark Ondris
Acting Deputy Insurance Fraud
Prosecutor
State of New Jersey

A TRUE BILL:



Foreperson

Dated: 6-4-14