

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

STATE GRAND JURY
NUMBER SGJ _____

SUPERIOR COURT
DOCKET NUMBER _____

STATE OF NEW JERSEY

)

v.

)

INDICTMENT

ARNOLD CHANDLER,
DANIELLE JACKSON,
SHONDA MARK,
JEANNINE SMITH,
ALEXA STEWART,
BRITANY STEWART, and
SCOTT TALMADGE

)

)

)

)

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

COUNT ONE

(CONSPIRACY- SECOND DEGREE)

Between on or about September 23, 2010 and September 26,
2011, at the Township of Union, in the County of Union, and
elsewhere, all within the jurisdiction of this Court,

JEANNINE SMITH and
ARNOLD CHANDLER,

who are named as defendants herein, did, with the purpose of
promoting or facilitating the commission of the crimes of
Insurance Fraud and Theft by Deception, 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 in 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 and Theft by Deception, a third degree crime, in violation of N.J.S.A. 2C:20-4, and among the means by which the defendants would carry out the conspiracy are the following:

1. It was part of the conspiracy that the said JEANNINE SMITH would purchase disability insurance from Aflac Incorporated ("Aflac") as a member of the Chandler Sound payroll group;

2. It was further part of the conspiracy that the said JEANNINE SMITH would submit or cause to be submitted false, fraudulent, or misleading disability claim forms to Aflac; and

3. It was further part of the conspiracy that the said ARNOLD CHANDLER would sign the employer certification section of the said disability claim forms; 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 TWO

(INSURANCE FRAUD - SECOND DEGREE)

Between on or about September 23, 2010 and September 26, 2011, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

JEANNINE SMITH

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 JEANNINE SMITH 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 the said JEANNINE SMITH 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 payments, reimbursement, or other benefit pursuant to an insurance policy or from an insurance company or an application to obtain or renew an insurance policy from an insurance company, and the aggregate value of the property, services, or benefits that the said JEANNINE SMITH wrongfully obtained or sought to obtain was at least \$1,000.00; specifically, on five or more occasions, the said JEANNINE SMITH

knowingly made, or caused to be made, fictitious, fraudulent, or misleading statements of material fact as part of, in support of, or in connection with an application to obtain disability insurance from Aflac and claims for payment or other benefit made to Aflac pursuant to a disability insurance policy that was issued on or about October 2, 2010 by Aflac, as follows:

(1) On or about September 23, 2010, the said JEANNINE SMITH did list an annual salary from Chandler Sound of \$55,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said JEANNINE SMITH well knew that she did not receive a \$55,000.00 salary from Chandler Sound;

(2) On October 14, 2010, the said JEANNINE SMITH did submit or cause to be submitted to Aflac an initial disability claim form bearing the alleged signature of a physician and claiming that the said JEANNINE SMITH was injured and disabled as a result of falling from a ladder, whereas, in truth and in fact, the said JEANNINE SMITH well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the form;

(3)-(14) On 12 separate occasions between October 26, 2010 and September 26, 2011, the said JEANNINE SMITH did submit or cause to be submitted to Aflac continuing disability claim forms bearing the alleged signature of a physician and claiming that

the said JEANNINE SMITH continued to be injured and disabled as a result of falling from a ladder, whereas, in truth and in fact, the said JEANNINE SMITH well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the forms;

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 THREE

(THEFT BY DECEPTION - THIRD DEGREE)

Between on or about October 14, 2010 and September 26, 2011, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

JEANNINE SMITH

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 JEANNINE SMITH purposely did obtain property in the amount of \$24,333.34 from Aflac by submitting or causing to be submitted to Aflac disability claim forms that created or reinforced the false impression that she was injured and disabled as a result of falling from a ladder and that she was treated by a physician in connection with the said injury and disability, whereas, in truth and in fact, the said JEANNINE SMITH well knew that she was not injured, disabled, and treated by a physician as described in the said disability claim forms, 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

(INSURANCE FRAUD - THIRD DEGREE)

Between on or about December 7, 2012 and January 24, 2013,
at the Township of Union, in the County of Union, and elsewhere,
all within the jurisdiction of this Court,

JEANNINE SMITH

did commit insurance fraud by knowingly making or causing to be made one or more false, fictitious, fraudulent, or misleading statements of material fact in, or knowingly omitting or causing 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 the said JEANNINE SMITH 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 or an application to obtain or renew an insurance policy from an insurance company; that is, the said JEANNINE SMITH knowingly made or caused to be made one or more false, fictitious, fraudulent, or misleading statement of material fact as part of, in support or, or in connection with an application to obtain disability insurance from Aflac and a claim for payment or other benefit made to Aflac pursuant to a disability

insurance policy that was issued on or about January 1, 2013 by Aflac, as follows:

(1) On or about December 7, 2012, the said JEANNINE SMITH did list an annual salary from Chicken Steak and Chocolate Cake of \$60,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said JEANNINE SMITH well knew that she did not receive a \$60,000.00 salary from Chicken Steak and Chocolate Cake;

(2) On January 24, 2013, the said JEANNINE SMITH did submit or cause to be submitted to Aflac an initial disability claim form bearing the alleged signature of a physician and claiming that the said JEANNINE SMITH was injured and disabled as a result of falling from a ladder, whereas, in truth and in fact, the said JEANNINE SMITH well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the form;

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 FIVE

(INSURANCE FRAUD - SECOND DEGREE)

Between on or about July 6, 2010 and December 7, 2012, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ARNOLD CHANDLER

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 ARNOLD CHANDLER 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 the said ARNOLD CHANDLER 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 payments, reimbursement, or other benefit pursuant to an insurance policy or from an insurance company or an application to obtain or renew an insurance policy from an insurance company, and the aggregate value of the property, services, or benefits that the said ARNOLD CHANDLER wrongfully obtained or sought to obtain was at least \$1,000.00; specifically, on five or more occasions, the said ARNOLD

CHANDLER knowingly made, or caused to be made, fictitious, fraudulent, or misleading statements of material fact as part of, in support of, or in connection with an application to obtain disability insurance from Aflac and claims for payment or other benefit made to Aflac pursuant to a disability insurance policy that was issued on or about July 12, 2010 by Aflac, as follows:

(1) On or about July 6, 2010, the said ARNOLD CHANDLER did list an annual salary from Chandler Sound of \$65,000.00, did indicate that he was not then on leave or not working because of sickness or injury, did indicate that he had not recently been prescribed medication for the treatment of an injury, disease, or disorder of a joint, and did indicate that he had not recently been treated for an injury, disease, or disorder of a joint, on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said ARNOLD CHANDLER well knew that he did not receive a \$65,000.00 salary from Chandler Sound, that he was then on a leave of absence from work due to sickness or injury, that he had recently been prescribed medication to treat a knee injury, and that he had recently been treated by a physician in connection with a knee injury;

(2) On July 29, 2010, the said ARNOLD CHANDLER did submit or cause to be submitted to Aflac an initial disability claim

form bearing the alleged signature of a physician and claiming that the said ARNOLD CHANDLER was injured and disabled as a result of falling on a staircase and causing injury to his left knee and lower back, whereas, in truth and in fact, the said ARNOLD CHANDLER well knew that he was not treated by the listed physician for the listed injury and the listed physician did not sign the form;

(3)-(11) On nine occasions between August 23, 2010 and March 25, 2011, the said ARNOLD CHANDLER did submit or cause to be submitted to Aflac continuing disability claim forms bearing the alleged signature of a physician and claiming that the said ARNOLD CHANDLER continued to be injured and disabled as a result of falling on a staircase and causing injury to his left knee and lower back, whereas, in truth and in fact, the said ARNOLD CHANDLER well knew that he was not treated by the listed physician for the listed injury and the listed physician did not sign the forms;

(12)-(16) On five occasions between June 26, 2011 and October 27, 2011, the said ARNOLD CHANDLER did submit or cause to be submitted to Aflac continuing disability claim forms bearing the alleged signature of a physician and claiming that the said ARNOLD CHANDLER continued to be injured and disabled as a result of lifting equipment causing immobility or injury to his spine, whereas, in truth and in fact, the said ARNOLD

CHANDLER well knew that he was not treated by the listed physician for the listed injury on all occasions indicated on the forms and the listed physician did not sign the forms;

(17) On November 18, 2011, the said ARNOLD CHANDLER did submit or cause to be submitted to Aflac, in support of an insurance claim for injury to his spine, a document apparently stating that the said ARNOLD CHANDLER was medically authorized to return to work following a period of disability on November 30, 2011 and purporting to be written and signed by a physician, whereas, in truth and in fact, the said ARNOLD CHANDLER well knew that, prior to submission to Aflac, the date listed on the document was altered from that actually written by the physician;

(18) On or about December 7, 2012, the said ARNOLD CHANDLER did list an annual salary from Chicken Steak and Chocolate Cake of \$50,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said ARNOLD CHANDLER well knew that he did not receive a \$50,000.00 salary from Chicken Steak and Chocolate Cake; 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 SIX

(THEFT BY DECEPTION - THIRD DEGREE)

Between on or about July 29, 2010 and September 25, 2012,
at the Township of Union, in the County of Union, and elsewhere,
all within the jurisdiction of this Court,

ARNOLD CHANDLER

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 ARNOLD CHANDLER purposely did obtain property in
the amount of \$61,639.99 from Aflac by submitting or causing to
be submitted to Aflac untruthful applications for disability
insurance and disability claim forms that created or reinforced
the false impression that he was injured and disabled as a
result of various incidents for which he was treated by
physicians, whereas, in truth and in fact, the said ARNOLD
CHANDLER well knew that the said disability insurance
applications contained untruthful and misleading information and
that he was not treated by physicians as described in the said
disability claim forms;
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 SEVEN

(CONSPIRACY- SECOND DEGREE)

Between on or about November 29, 2011 and February 13, 2012, in the City of Perth Amboy, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

SHONDA MARK and
JEANNINE SMITH,

who are named as defendants herein, did, with the purpose of promoting or facilitating the commission of the crimes of Insurance Fraud and Theft by Deception, 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 in 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 and Theft by Deception, a third degree crime, in violation of N.J.S.A. 2C:20-4, and among the means by which the defendants would carry out the conspiracy are the following:

1. It was part of the conspiracy that the said SHONDA MARK would purchase disability insurance from Aflac as a member of the Chicken Steak and Chocolate Cake payroll group;

2. It was further part of the conspiracy that the said SHONDA MARK would submit or cause to be submitted false, fraudulent, or misleading disability claim forms to Aflac; and

3. It was further part of the conspiracy that the said JEANNINE SMITH would sign the employer certification section of the said disability claim forms;

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 EIGHT

(INSURANCE FRAUD - SECOND DEGREE)

Between on or about November 29, 2011 and February 13, 2012, in the City of Perth Amboy, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

SHONDA MARK

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 SHONDA MARK 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 the said SHONDA MARK 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 payments, reimbursement, or other benefit pursuant to an insurance policy or from an insurance company or an application to obtain or renew an insurance policy from an insurance company, and the aggregate value of the property, services, or benefits that the said SHONDA MARK wrongfully obtained or sought to obtain was at least \$1,000.00; specifically, on five or more occasions, the said SHONDA MARK

knowingly made, or caused to be made, fictitious, fraudulent, or misleading statements of material fact as part of, in support of, or in connection with an application to obtain disability insurance from Aflac and claims for payment or other benefit made to Aflac pursuant to a disability insurance policy that was issued on or about December 1, 2011 by Aflac, as follows:

(1) On or about November 29, 2011, the said SHONDA MARK did list an annual salary from Chicken Steak and Chocolate Cake of \$70,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said SHONDA MARK well knew that she did not receive a \$70,000.00 salary from Chicken Steak and Chocolate Cake;

(2) On December 7, 2011, the said SHONDA MARK did submit or cause to be submitted to Aflac an initial disability claim form bearing the alleged signature of a physician and claiming that the said SHONDA MARK was injured and disabled as a result of burns to the hands, face, and feet, whereas, in truth and in fact, the said SHONDA MARK well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the form;

(3)-(5) On three occasions between December 31, 2011 and February 9, 2012, the said SHONDA MARK did submit or cause to be submitted to Aflac continuing disability claim forms bearing the alleged signatures of physicians and claiming that the said

SHONDA MARK continued to be injured and disabled as a result of burns to the hands, face, and feet, whereas, in truth and in fact, the said SHONDA MARK well knew that she was not treated by the listed physicians for the listed injury and the listed physicians did not sign the forms;

(4) On February 13, 2012, the said SHONDA MARK did submit or cause to be submitted to Aflac, in support of an insurance claim related to burns to the hands, face, and feet, a document stating that the said SHONDA MARK was medically authorized to return to work on April 15, 2012 following a period of disability, whereas, in truth and in fact, the said SHONDA MARK well knew that the physician whose name and signature appear on the document did not treat the said SHONDA MARK for burns to the hands, face, and feet; 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 NINE

(THEFT BY DECEPTION - THIRD DEGREE)

Between on or about December 7, 2011 and February 13, 2012,
in the City of Perth Amboy, in the County of Middlesex, and
elsewhere, all within the jurisdiction of this Court,

SHONDA MARK

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 SHONDA MARK purposely did obtain property in the
amount of \$3,833.33 from Aflac by submitting or causing to be
submitted to Aflac disability claim forms that created or
reinforced the false impression that she was injured and
disabled as a result of burns to the hands, face, and feet and
that she was treated by physicians in connection with the said
injury and disability, whereas, in truth and in fact, the said
SHONDA MARK well knew that she was not injured, disabled, and
treated by physicians as described in the said disability claim
forms,

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 TEN

(CONSPIRACY- SECOND DEGREE)

Between on or about October 28, 2011 and October 17, 2012,
at the Township of Union, in the County of Union, and elsewhere,
all within the jurisdiction of this Court,

ALEXA STEWART and
JEANNINE SMITH,

who are named as defendants herein, did, with the purpose of
promoting or facilitating the commission of the crimes of
Insurance Fraud and Theft by Deception, 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 in 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 and Theft by Deception, a third degree crime,
in violation of N.J.S.A. 2C:20-4, and among the means by which
the defendants would carry out the conspiracy are the following:

1. It was part of the conspiracy that the said ALEXA
STEWART would purchase disability insurance from Aflac as a
member of the Chicken Steak and Chocolate Cake payroll group;

2. It was further part of the conspiracy that the said ALEXA STEWART would submit or cause to be submitted false, fraudulent, or misleading disability claim forms to Aflac; and

3. It was further part of the conspiracy that the said JEANNINE SMITH would sign the employer certification section of the said disability claim forms;

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 ELEVEN

(INSURANCE FRAUD - SECOND DEGREE)

Between on or about October 28, 2011 and December 7, 2012,
at the Township of Union, in the County of Union, and elsewhere,
all within the jurisdiction of this Court,

ALEXA STEWART

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 ALEXA STEWART 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 the said ALEXA STEWART 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 payments, reimbursement, or other benefit pursuant to an insurance policy or from an insurance company or an application to obtain or renew an insurance policy from an insurance company, and the aggregate value of the property, services, or benefits that the said ALEXA STEWART wrongfully obtained or sought to obtain was at least \$1,000.00; specifically, on five or more occasions, the said ALEXA STEWART

knowingly made, or caused to be made, fictitious, fraudulent, or misleading statements of material fact as part of, in support of, or in connection with an application to obtain disability insurance from Aflac and claims for payment or other benefit made to Aflac pursuant to a disability insurance policy that was issued on or about November 1, 2011 by Aflac, as follows:

(1) On or about October 28, 2011, the said ALEXA STEWART did list an annual salary from Chicken Steak and Chocolate Cake of \$50,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said ALEXA STEWART well knew that she did not receive a \$50,000.00 salary from Chicken Steak and Chocolate Cake;

(2) On January 26, 2012, the said ALEXA STEWART did submit or cause to be submitted to Aflac an initial disability claim form bearing the alleged signature of a physician and claiming that the said ALEXA STEWART was injured and disabled as a result of a slip on ice causing immobility and severe pain, whereas, in truth and in fact, the said ALEXA STEWART well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the form;

(3)-(6) On four occasions between March 19, 2012 and October 17, 2012, the said ALEXA STEWART did submit or cause to be submitted to Aflac continuing disability claim forms bearing the alleged signature of a physician and claiming that the said

ALEXA STEWART continued to be injured and disabled as a result of a slip on ice causing immobility and severe pain, whereas, in truth and in fact, the said ALEXA STEWART well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the forms;

(7) On or about December 7, 2012, the said ALEXA STEWART did list an annual salary from Chicken Steak and Chocolate Cake of \$45,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said ALEXA STEWART well knew that she did not receive a \$45,000.00 salary from Chicken Steak and Chocolate Cake; 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 TWELVE

(THEFT BY DECEPTION - THIRD DEGREE)

Between on or about January 26, 2012 and October 17, 2012,
at the Township of Union, in the County of Union, and elsewhere,
all within the jurisdiction of this Court,

ALEXA STEWART

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 ALEXA STEWART purposely did obtain property in the
amount of \$11,940.00 from Aflac by submitting or causing to be
submitted to Aflac disability claim forms that created or
reinforced the false impression that she was injured and
disabled as a result of a slip on ice causing immobility and
severe pain and that she was treated by a physician in
connection with the said injury and disability, whereas, in
truth and in fact, the said ALEXA STEWART well knew that she was
not injured, disabled, and treated by a physician as described
in the said disability claim forms,
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 THIRTEEN

(CONSPIRACY- SECOND DEGREE)

Between on or about October 28, 2011 and August 8, 2012, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

BRITTANY STEWART and
JEANNINE SMITH,

who are named as defendants herein, did, with the purpose of promoting or facilitating the commission of the crimes of Insurance Fraud and Theft by Deception, 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 in 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 and Theft by Deception, a third degree crime, in violation of N.J.S.A. 2C:20-4, and among the means by which the defendants would carry out the conspiracy are the following:

1. It was part of the conspiracy that the said BRITTANY STEWART would purchase disability insurance from Aflac as a member of the Chicken Steak and Chocolate Cake payroll group;

2. It was further part of the conspiracy that the said BRITTANY STEWART would submit or cause to be submitted false, fraudulent, or misleading disability claim forms to Aflac; and

3. It was further part of the conspiracy that the said JEANNINE SMITH would sign the employer certification section of the said disability claim forms;

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 FOURTEEN

(INSURANCE FRAUD - SECOND DEGREE)

Between on or about October 28, 2011 and December 7, 2012,
at the Township of Union, in the County of Union, and elsewhere,
all within the jurisdiction of this Court,

BRITTANY STEWART

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 BRITTANY STEWART 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 the said BRITTANY STEWART 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 payments, reimbursement, or other benefit pursuant to an insurance policy or from an insurance company or an application to obtain or renew an insurance policy from an insurance company, and the aggregate value of the property, services, or benefits that the said BRITTANY STEWART wrongfully obtained or sought to obtain was at least \$1,000.00; specifically, on five or more occasions, the said BRITTANY

STEWART knowingly made, or caused to be made, fictitious, fraudulent, or misleading statements of material fact as part of, in support of, or in connection with an application to obtain disability insurance from Aflac and claims for payment or other benefit made to Aflac pursuant to a disability insurance policy that was issued on or about November 1, 2011 by Aflac, as follows:

(1) On or about October 28, 2011, the said BRITTANY STEWART did list an annual salary from Chicken Steak and Chocolate Cake of \$50,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said BRITTANY STEWART well knew that she did not receive a \$50,000.00 salary from Chicken Steak and Chocolate Cake;

(2) On November 18, 2011, the said BRITTANY STEWART did submit or cause to be submitted to Aflac an initial disability claim form bearing the alleged signature of a physician and claiming that the said BRITTANY STEWART was injured and disabled as a result of lifting or moving furniture causing spinal damage, immobility and / or injury, whereas, in truth and in fact, the said BRITTANY STEWART well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the form;

(3)-(11) On nine occasions between December 29, 2011 and August 8, 2012, the said BRITTANY STEWART did submit or cause to

be submitted to Aflac continuing disability claim forms bearing the alleged signatures of a physician and claiming that the said BRITTANY STEWART continued to be injured and disabled as a result of lifting or moving furniture causing spinal damage, immobility and / or injury, whereas, in truth and in fact, the said BRITTANY STEWART well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the forms;

(12) On or about December 7, 2012, the said BRITTANY STEWART did list an annual salary from Chicken Steak and Chocolate Cake of \$45,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said BRITTANY STEWART well knew that she did not receive a \$45,000.00 salary from Chicken Steak and Chocolate Cake;

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 FIFTEEN

(THEFT BY DECEPTION - THIRD DEGREE)

Between on or about November 18, 2011 and August 8, 2012,
at the Township of Union, in the County of Union, and elsewhere,
all within the jurisdiction of this Court,

BRITTANY STEWART

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 BRITTANY STEWART purposely did obtain property in
the amount of \$11,940.00 from Aflac by submitting or causing to
be submitted to Aflac disability claim forms that created or
reinforced the false impression that she was injured and
disabled as a result of lifting or moving furniture causing
spinal damage, immobility and / or injury and that she was
treated by a physician in connection with the said injury and
disability, whereas, in truth and in fact, the said BRITTANY
STEWART well knew that she was not injured, disabled, and
treated by a physician as described in the said disability claim
forms,
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 SIXTEEN

(CONSPIRACY- THIRD DEGREE)

Between on or about December 17, 2012 and February 20, 2013, at the Township of Edison, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

SCOTT TALMADGE and
JEANNINE SMITH,

who are named as defendants herein, did, with the purpose of promoting or facilitating the commission of the crime of Insurance Fraud, agree that:

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

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

that is, Insurance Fraud, a second degree crime, in violation of N.J.S.A. 2C:21-4.6, and among the means by which the defendants would carry out the conspiracy are the following:

1. It was part of the conspiracy that the said SCOTT TALMADGE would purchase disability insurance from Aflac as a member of the Chicken Steak and Chocolate Cake payroll group;

2. It was further part of the conspiracy that the said SCOTT TALMADGE would submit or cause to be submitted false, fraudulent, or misleading disability claim forms to Aflac; and

3. It was further part of the conspiracy that the said JEANNINE SMITH would sign the employer certification section of the said disability claim forms;

OVERT ACTS

The Grand Jurors aforesaid, upon their oaths, do further present that, in furtherance of the said conspiracy, the following overt acts, among others, were committed:

1. On or about December 17, 2012, at the Township of Edison, in the County of Middlesex, and within the jurisdiction of this Court, the said SCOTT TALMADGE did apply for disability insurance as part of the Chicken Steak and Chocolate Cake payroll group and list an annual salary from Chicken Steak and Chocolate Cake of \$45,000.00, and

2. On February 19, 2013, the said SCOTT TALMADGE and JEANNINE SMITH did sign disability claim forms that were to be submitted to Aflac claiming that the said SCOTT TALMADGE was injured and disabled as a result of back or lumbar pain.

All 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 SEVENTEEN

(INSURANCE FRAUD - THIRD DEGREE)

Between on or about December 17, 2012 and February 20, 2013, at the Township of Edison, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

SCOTT TALMADGE

did commit insurance fraud by knowingly making or causing to be made one or more false, fictitious, fraudulent, or misleading statements of material fact in, or knowingly omitting or causing 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 the said SCOTT TALMADGE 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 or an application to obtain or renew an insurance policy from an insurance company; that is, the said SCOTT TALMADGE knowingly made or caused to be made one or more false, fictitious, fraudulent, or misleading statement of material fact as part of, in support or, or in connection with an application to obtain disability insurance from Aflac and a claim for payment or other benefit made to Aflac pursuant to a disability

insurance policy that was issued on or about January 1, 2013 by Aflac, as follows:

(1) On or about December 17, 2012, the said SCOTT TALMADGE did list an annual salary from Chicken Steak and Chocolate Cake of \$45,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said SCOTT TALMADGE well knew that she did not receive a \$45,000.00 salary from Chicken Steak and Chocolate Cake;

(2) On February 20, 2013, the said SCOTT TALMADGE did submit or cause to be submitted to Aflac an initial disability claim form bearing the alleged signature of a physician and claiming that the said SCOTT TALMADGE was injured and disabled as a result of back or lumbar pain, whereas, in truth and in fact, the said SCOTT TALMADGE well knew that he was not treated by the listed physician for the listed injury and the listed physician did not sign the form;

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 EIGHTEEN

(INSURANCE FRAUD - THIRD DEGREE)

Between on or about November 29, 2011 and August 10, 2012,
at the Township of Holmdel, in the County of Monmouth, and
elsewhere, all within the jurisdiction of this Court,

DANIELLE JACKSON

did commit insurance fraud by knowingly making or causing to be made one or more false, fictitious, fraudulent, or misleading statements of material fact in, or knowingly omitting or causing 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 the said DANIELLE JACKSON 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 or an application to obtain or renew an insurance policy from an insurance company; that is, the said DANIELLE JACKSON knowingly made or caused to be made one or more false, fictitious, fraudulent, or misleading statement of material fact as part of, in support or, or in connection with an application to obtain disability insurance from Aflac and a claim for payment or other benefit made to Aflac pursuant to a disability

insurance policy that was issued on or about November 29, 2011 by Aflac, as follows:

(1) On or about November 29, 2011, the said DANIELLE JACKSON did list an annual salary from Chicken Steak and Chocolate Cake of \$67,000.00 on an application for disability insurance that was submitted to Aflac, whereas, in truth and in fact, the said DANIELLE JACKSON well knew that she did not receive a \$67,000.00 salary from Chicken Steak and Chocolate Cake;

(2) On May 1, 2012, the said DANIELLE JACKSON did submit or cause to be submitted to Aflac an initial disability claim form claiming that the said DANIELLE JACKSON was injured and disabled as a result of a wrist fracture, whereas, in truth and in fact, the said DANIELLE JACKSON well knew that she was not treated by the listed physician for the listed injury;

(3) On May 8, 2012, the said DANIELLE JACKSON did submit or cause to be submitted to Aflac an initial disability claim form bearing the alleged signature of a physician and claiming that the said DANIELLE JACKSON was injured and disabled as a result of a wrist fracture, whereas, in truth and in fact, the said DANIELLE JACKSON well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the form;

(4) On August 10, 2012, the said DANIELLE JACKSON did submit or cause to be submitted to Aflac a continuing disability claim form bearing the alleged signature of a physician and claiming that the said DANIELLE JACKSON continued to be injured and disabled as a result of a wrist fracture, whereas, in truth and in fact, the said DANIELLE JACKSON well knew that she was not treated by the listed physician for the listed injury and the listed physician did not sign the form; 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 NINETEEN

(THEFT BY DECEPTION - THIRD DEGREE)

Between on or about November 29, 2011 and August 10, 2012,
at the Township of Holmdel, in the County of Monmouth, and
elsewhere, all within the jurisdiction of this Court,

DANIELLE JACKSON

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 DANIELLE JACKSON purposely did obtain property in
the amount of \$14,240.00 from Aflac by submitting or causing to
be submitted to Aflac disability claim forms that created or
reinforced the false impression that she was injured and
disabled as a result of a wrist fracture and that she was
treated by a physician in connection with the said injury and
disability, whereas, in truth and in fact, the said DANIELLE
JACKSON well knew that she was not injured, disabled, and
treated by a physician as described in the said disability claim
forms,
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.

COUNTS TWENTY THROUGH THIRTY-TWO

(FORGERY - FOURTH DEGREE)

On thirteen occasions between on or about October 14, 2010 and September 25, 2011, each of which is listed in the chart below, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

JEANNINE SMITH

did, with the purpose to defraud or injury Aflac, make, complete, execute, authenticate, issue or transfer a writing so that it purports to be the act of another who did not authorize that act; that is, the said JEANNINE SMITH did make or complete the physician certification page of a disability claim form so that it purported to be the act of Doctor Clark Philogene, without the authorization of the said Doctor Clark Philogene, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

<u>COUNT</u>	<u>DATE</u>	<u>COUNT</u>	<u>DATE</u>	<u>COUNT</u>	<u>DATE</u>
20	10/14/2010	25	2/26/2011	30	7/25/2011
21	10/26/2010	26	3/29/2011	31	8/25/2011
22	11/29/2010	27	4/26/2011	32	9/25/2011
23	12/28/2010	28	5/27/2011		
24	1/26/2011	29	6/28/2011		

COUNT THIRTY-THREE

(FORGERY - FOURTH DEGREE)

On or about January 24, 2013, at the Township of Edison, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

JEANNINE SMITH

did, with the purpose to defraud or injury Aflac, make, complete, execute, authenticate, issue or transfer a writing so that it purports to be the act of another who did not authorize that act; that is, the said JEANNINE SMITH did make or complete the physician certification page of a disability claim form so that it purported to be the act of Doctor Maria Goyco, without the authorization of the said Doctor Maria Goyco, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-FOUR

(FORGERY - FOURTH DEGREE)

On or about July 27, 2010, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ARNOLD CHANDLER

did, with the purpose to defraud or injury Aflac, alter or change a writing of another without authorization; that is, the said ARNOLD CHANDLER did alter or change a physician certification page of a disability claim form without the authorization of Doctor Nazar Haidri, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(1), and against the peace of this State, the government and dignity of the same.

COUNTS THIRTY-FIVE THROUGH FORTY-THREE

(FORGERY - FOURTH DEGREE)

On nine occasions between on or about August 23, 2010 and March 25, 2011, each of which is listed in the chart below, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ARNOLD CHANDLER

did, with the purpose to defraud or injury Aflac, make, complete, execute, authenticate, issue or transfer a writing so that it purports to be the act of another who did not authorize that act; that is, the said ARNOLD CHANDLER did make or complete the physician certification page of a disability claim form so that it purported to be the act of Doctor Nazar Haidri, without the authorization of the said Doctor Nazar Haidri, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

<u>COUNT</u>	<u>DATE</u>	<u>COUNT</u>	<u>DATE</u>
35	8/23/2010	40	12/14/2010
36	9/14/2010	41	1/14/2011
37	9/22/2010	42	2/23/2011
38	10/14/2010	43	3/25/2011
39	10/27/2010		

COUNTS FORTY-FOUR THROUGH FORTY-EIGHT

(FORGERY - FOURTH DEGREE)

On five occasions between on or about June 25, 2011 and October 26, 2011, each of which is listed in the chart below, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ARNOLD CHANDLER

did, with the purpose to defraud or injury Aflac, make, complete, execute, authenticate, issue or transfer a writing so that it purports to be the act of another who did not authorize that act; that is, the said ARNOLD CHANDLER did make or complete the physician certification page of a disability claim form so that it purported to be the act of Doctor Kaixuan Liu, without the authorization of the said Doctor Kaixuan Liu, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

<u>COUNT</u>	<u>DATE</u>
44	6/25/2011
45	7/25/2011
46	8/24/2011
47	9/24/2011
48	10/26/2011

COUNT FORTY-NINE

(FORGERY - FOURTH DEGREE)

On or about October 27, 2011, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ARNOLD CHANDLER

did, with the purpose to defraud or injury Aflac, alter or change a writing of another without authorization; that is, the said ARNOLD CHANDLER did alter or change a writing apparently stating that the said ARNOLD CHANDLER was medically authorized to return to work following a period of disability without the authorization of Doctor Kaixuan Liu, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(1), and against the peace of this State, the government and dignity of the same.

COUNTS FIFTY THROUGH FIFTY-TWO

(FORGERY - FOURTH DEGREE)

On three occasions between on or about December 5, 2011 and January 18, 2012, each of which is listed in the chart below, in the City of Perth Amboy, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

SHONDA MARK

did, with the purpose to defraud or injury Aflac, make, complete, execute, authenticate, issue or transfer a writing so that it purports to be the act of another who did not authorize that act; that is, the said SHONDA MARK did make or complete the physician certification page of a disability claim form so that it purported to be the act of Doctor John Chafos, without the authorization of the said Doctor John Chafos, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

<u>COUNT</u>	<u>DATE</u>
50	12/5/2011
51	12/27/2011
52	1/18/2012

COUNT FIFTY-THREE

(FORGERY - FOURTH DEGREE)

On or about February 8, 2012, in the City of Perth Amboy,
in the County of Middlesex, and elsewhere, all within the
jurisdiction of this Court,

SHONDA MARK

did, with the purpose to defraud or injury Aflac, make,
complete, execute, authenticate, issue or transfer a writing so
that it purports to be the act of another who did not authorize
that act; that is, the said SHONDA MARK did make or complete the
physician certification page of a disability claim form so that
it purported to be the act of Doctor Kenneth Burns, without the
authorization of the said Doctor Kenneth Burns, with the purpose
to defraud or injury Aflac,
contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against
the peace of this State, the government and dignity of the same.

COUNTS FIFTY-FOUR THROUGH FIFTY-EIGHT

(FORGERY - FOURTH DEGREE)

On five occasions between on or about January 23, 2012 and October 12, 2012, each of which is listed in the chart below, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ALEXA STEWART

did, with the purpose to defraud or injury Aflac, make, complete, execute, authenticate, issue or transfer a writing so that it purports to be the act of another who did not authorize that act; that is, the said ALEXA STEWART did make or complete the physician certification page of a disability claim form so that it purported to be the act of Doctor Kaixuan Liu, without the authorization of the said Doctor Kaixuan Liu, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

<u>COUNT</u>	<u>DATE</u>
54	1/23/2012
55	3/12/2012
56	4/19/2012
57	6/25/2012
58	10/12/2012

COUNTS FIFTY-NINE THROUGH SIXTY-SIX

(FORGERY - FOURTH DEGREE)

On eight occasions between on or about November 18, 2011 and July 18, 2012, each of which is listed in the chart below, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

BRITTANY STEWART

did, with the purpose to defraud or injury Aflac, make, complete, execute, authenticate, issue or transfer a writing so that it purports to be the act of another who did not authorize that act; that is, the said BRITTANY STEWART did make or complete the physician certification page of a disability claim form so that it purported to be the act of Doctor Nazar Haidri, without the authorization of the said Doctor Nazar Haidri, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

<u>COUNT</u>	<u>DATE</u>	<u>COUNT</u>	<u>DATE</u>
59	11/18/2011	64	5/2/2012
60	12/26/2011	65	6/15/2012
61	1/20/2012	66	7/18/2012
62	3/5/2012		
63	3/27/2012		

COUNT SIXTY-SEVEN

(FORGERY - FOURTH DEGREE)

On or about April 6, 2012, at the Township of Edison, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

DANIELLE JACKSON

did, with the purpose to defraud or injury Aflac, make, complete, execute, authenticate, issue or transfer a writing so that it purports to be the act of another who did not authorize that act; that is, the said DANIELLE JACKSON did make or complete the physician certification page of a disability claim form so that it purported to be the act of Doctor Lin Xu, without the authorization of the said Doctor Lin Xu, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-EIGHT

(FORGERY - FOURTH DEGREE)

On or about July 23, 2012, at the Township of Edison, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

DANIELLE JACKSON

did, with the purpose to defraud or injury Aflac, make, complete, execute, authenticate, issue or transfer a writing so that it purports to be the act of another who did not authorize that act; that is, the said DANIELLE JACKSON did make or complete the physician certification page of a disability claim form so that it purported to be the act of Doctor Khurram Pervaiz, without the authorization of the said Doctor Khurram Pervaiz, with the purpose to defraud or injury Aflac, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

COUNT SIXTY-NINE

(FORGERY - FOURTH DEGREE)

On or about February 18, 2013, at the Township of Edison,
in the County of Middlesex, and elsewhere, all within the
jurisdiction of this Court,

SCOTT TALMADGE

did, with the purpose to defraud or injury Aflac, make,
complete, execute, authenticate, issue or transfer a writing so
that it purports to be the act of another who did not authorize
that act; that is, the said SCOTT TALMADGE did make or complete
the physician certification page of a disability claim form so
that it purported to be the act of Doctor Anthony D'Almeida,
without the authorization of the said Doctor Anthony D'Almeida,
with the purpose to defraud or injury Aflac,
contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against
the peace of this State, the government and dignity of the same.

COUNT SEVENTY

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 15, 2013, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

JEANNINE SMITH

did fail to file a return or report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law; that is, the said JEANNINE SMITH did fail to file a gross income tax return, FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to defraud the State of New Jersey or to evade, avoid, or otherwise not make timely payment, or any part thereof, of New Jersey gross income tax due for the 2012 tax year to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-ONE

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 15, 2013, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

JEANNINE SMITH

did, with the intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54A:8-1 et seq., fail to pay and turn over gross income taxes due and owing to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey for the 2012 tax year, contrary to the provisions of N.J.S.A. 54:52-9 and against the peace of this State, the government, and dignity of the same.

COUNT SEVENTY-TWO

(FILING FALSE OR FRAUDULENT TAX RETURN - THIRD DEGREE)

On or about April 15, 2011, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

JEANNINE SMITH

did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent return, report, statement, or application required to be filed pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law, with the intent to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, or interest, or any part thereof; that is, the said JEANNINE SMITH did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey gross income tax, fee, penalty, or interest, or any part thereof, due for the 2010 tax year to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-THREE

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 15, 2013, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ARNOLD CHANDLER

did fail to file a return or report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law; that is, the said ARNOLD CHANDLER did fail to file a gross income tax return, FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to defraud the State of New Jersey or to evade, avoid, or otherwise not make timely payment, or any part thereof, of New Jersey gross income tax due for the 2012 tax year to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-FOUR

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 15, 2013, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ARNOLD CHANDLER

did, with the intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54A:8-1 et seq., fail to pay and turn over gross income taxes due and owing to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey for the 2012 tax year, contrary to the provisions of N.J.S.A. 54:52-9 and against the peace of this State, the government, and dignity of the same.

COUNT SEVENTY-FIVE

(FILING FALSE OR FRAUDULENT TAX RETURN - THIRD DEGREE)

On or about April 15, 2011, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ARNOLD CHANDLER

did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent return, report, statement, or application required to be filed pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law, with the intent to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, or interest, or any part thereof; that is, the said ARNOLD CHANDLER did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey gross income tax, fee, penalty, or interest, or any part thereof, due for the 2010 tax year to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-SIX

(FILING FALSE OR FRAUDULENT TAX RETURN - THIRD DEGREE)

On or about April 16, 2012, in the City of Perth Amboy, in the County of Middlesex, and elsewhere, all within the jurisdiction of this Court,

SHONDA MARK

did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent return, report, statement, or application required to be filed pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law, with the intent to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, or interest, or any part thereof; that is, the said SHONDA MARK did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey gross income tax, fee, penalty, or interest, or any part thereof, due for the 2011 tax year to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-SEVEN

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 16, 2012, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ALEXA STEWART

did fail to file a return or report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law; that is, the said ALEXA STEWART did fail to file a gross income tax return, FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to defraud the State of New Jersey or to evade, avoid, or otherwise not make timely payment, or any part thereof, of New Jersey gross income tax due for the 2011 tax year to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTY-EIGHT

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 16, 2012, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ALEXA STEWART

did, with the intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54A:8-1 et seq., fail to pay and turn over gross income taxes due and owing to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey for the 2011 tax year, contrary to the provisions of N.J.S.A. 54:52-9 and against the peace of this State, the government, and dignity of the same.

COUNT SEVENTY-NINE

(FAILURE TO FILE TAX RETURN - THIRD DEGREE)

On or about April 15, 2013, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ALEXA STEWART

did fail to file a return or report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof that is due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law; that is, the said ALEXA STEWART did fail to file a gross income tax return, FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to defraud the State of New Jersey or to evade, avoid, or otherwise not make timely payment, or any part thereof, of New Jersey gross income tax due for the 2012 tax year to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY

(FAILURE TO PAY TAXES - THIRD DEGREE)

On or about April 15, 2013, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

ALEXA STEWART

did, with the intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54A:8-1 et seq., fail to pay and turn over gross income taxes due and owing to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey for the 2012 tax year, contrary to the provisions of N.J.S.A. 54:52-9 and against the peace of this State, the government, and dignity of the same.

COUNT EIGHTY-ONE

(FILING FALSE OR FRAUDULENT TAX RETURN - THIRD DEGREE)

On or about April 16, 2012, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

BRITTANY STEWART

did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent return, report, statement, or application required to be filed pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law, with the intent to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, or interest, or any part thereof; that is, the said BRITTANY STEWART did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey gross income tax, fee, penalty, or interest, or any part thereof, due for the 2011 tax year to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY-TWO

(FILING FALSE OR FRAUDULENT TAX RETURN - THIRD DEGREE)

On or about April 15, 2013, at the Township of Union, in the County of Union, and elsewhere, all within the jurisdiction of this Court,

BRITTANY STEWART

did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent return, report, statement, or application required to be filed pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law, with the intent to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, or interest, or any part thereof; that is, the said BRITTANY STEWART did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey gross income tax, fee, penalty, or interest, or any part thereof, due for the 2012 tax year to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTY-THREE

(FILING FALSE OR FRAUDULENT TAX RETURN - THIRD DEGREE)

On or about April 16, 2012, at the Township of Holmdel, in the County of Monmouth, and elsewhere, all within the jurisdiction of this Court,

DANIELLE JACKSON

did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent return, report, statement, or application required to be filed pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:48-1, et seq., or any State tax law, with the intent to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, or interest, or any part thereof; that is, the said DANIELLE JACKSON did file, prepare, cause to be filed, or assist in the preparation or filing of a false or fraudulent FORM NJ-1040, required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1, with the intent to evade, avoid, or otherwise not make timely payment of New Jersey gross income tax, fee, penalty, or interest, or any part thereof, due for the 2011 tax year to the Director of the Division of Taxation in the

Department of the Treasury of the State of New Jersey,
contrary to the provisions of N.J.S.A. 54:52-10, and against the
peace of this State, the government and dignity of the same.

Ronald Chillemi
Acting Insurance Fraud Prosecutor
State of New Jersey

A TRUE BILL:

Foreperson

Dated: _____