

FILED

MAR 16 2015

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ666-15-2
Superior Court 5 - 0 3 - 0 0 0 3 3 - 0
Docket Number _____

STATE OF NEW JERSEY)	
)	INDICTMENT
V.)	
JAN VAN HOLT)	
SONDRA STEEN)	
SUSAN HAMLETT)	
WILLIAM PRICE)	
and)	
MARIA TERESA SAMON-DACLAN)	

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

COUNT ONE

(Conspiracy - First Degree)

JAN VAN HOLT

and

SONDRA STEEN

and another person whose identity is known to the Grand Jurors, between on or about January 1, 2003, and December 20, 2012, at the City of Northfield, at the City of Linwood, at the City of Margate, at the City of Ventnor, at the City of Atlantic City, at the Township of Galloway, at the Township of Egg Harbor, all in

the County of Atlantic, elsewhere and within the jurisdiction of this Court, with the purpose of promoting and facilitating the crime of Financial Facilitation of Criminal Activity (Money Laundering), Official Misconduct and Theft by Deception, did agree together and with another person whose identity is known to the Grand Jurors that:

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

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

A. Financial Facilitation, in that one or more of them would knowingly or purposely engage in transactions involving property with a value of \$500,000 or more, known to be derived from criminal activity, or which a reasonable person would believe to be derived from criminal activity, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2)(a).

B. Official Misconduct, in that one or more of them, being a public servant, acting with a purpose to obtain a benefit for themselves or another, or both, in excess of \$200 or to injure or

to deprive another of a benefit in excess of \$200, did, in complicity with one another, commit one or more acts relating to JAN VAN HOLT's office, but constituting unauthorized exercises of JAN VAN HOLT's official functions, knowing that such acts were unauthorized or that they were committed in an unauthorized manner or did refrain from performing a duty imposed upon JAN VAN HOLT by law or clearly inherent in the nature of JAN VAN HOLT's and office, that is JAN VAN HOLT, then and there being a public servant, to wit: Social Worker with the Atlantic County Department of Human Services, Division of Intergenerational Services, and SONDRRA STEEN, and an individual known to the Grand Jurors, being her accomplices, and JAN VAN HOLT having thereby the official functions and duties of a Social Worker, including among others, to perform office and field work necessary to provide referrals and social services for senior citizens, to refrain from using or attempting to use their official position to secure unwarranted privileges or advantages for herself or others, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did knowingly and without authorization access and convert the assets of senior citizens and their estates, who were JAN VAN HOLT's assigned clients or became known to her through her employment as a Social Worker, with purpose to obtain a benefit for JAN VAN HOLT or another, or both, in excess

of \$200 or to injure or deprive another of a benefit in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2.

C. Theft by Deception, in that one or more of them would purposely obtain the property of another, in the amount of \$75,000 or more, by deception, by creating or reinforcing a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4.

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

(Financial Facilitation - First Degree)

JAN VAN HOLT

and

SONDRA STEEN

and another person whose identity is known to the Grand Jurors, between on or about January 1, 2003, and December 20, 2012, at the City of Northfield, at the City of Linwood, at the City of Margate, at the City of Ventnor, at the City of Atlantic City, at the Township of Galloway, at the Township of Egg Harbor, all in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did commit the offense of financial facilitation of criminal activity, in that the said JAN VAN HOLT, SONDRA STEEN, and another person whose identity is known to the Grand Jurors, did engage in transactions involving property with a value of \$500,000 or more, known or which a reasonable person would believe to be derived from criminal activity, that is Theft by Deception, contrary to the provisions of N.J.S.A. 2C:20-4, and Official Misconduct, contrary to N.J.S.A. 2C:30-2, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is JAN VAN HOLT, SONDRA STEEN and another person whose identity is

known to the Grand Jurors did access and convert the assets of elderly individuals and their estates for their own use, contrary to the provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2)(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Second Degree)

JAN VAN HOLT

and

SONDRA STEEN

and another person whose identity is known to the Grand Jurors, between on or about January 1, 2003, and December 20, 2012, at the City of Northfield, at the City of Linwood, at the City of Margate, at the City of Ventnor, at the City of Atlantic City, at the Township of Galloway, at the Township of Egg Harbor, all in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposely obtain the property of another, in an amount of \$75,000 or more, by deception, that is JAN VAN HOLT, SONDRA STEEN and another person whose identity is known to the Grand Jurors, did create or reinforce the false impression that they were authorized to access and convert the assets of elderly individuals and their estates for their own use,

WHEREAS IN TRUTH AND IN FACT, as JAN VAN HOLT, SONDRA STEEN, and another person whose identity is known to the Grand Jurors, well knew, they were not authorized to access and convert the assets of elderly individuals and their estates, in an amount in excess of \$75,000, for their own use, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-20-2, N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Official Misconduct - Second Degree)

JAN VAN HOLT

SONDRA STEEN

and

WILLIAM PRICE

and another person whose identity is know to the Grand Jurors, between on or about June 1, 2003, and February 7, 2011, at the City of Northfield, at the City of Margate, all in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did commit the offense of Official Misconduct, in that the said JAN VAN HOLT, SONDRA STEEN, WILLIAM PRICE and another person whose identity is known to the Grand Jurors, acting with a purpose to obtain a benefit for themselves or another, or both, in excess of \$200 or to injure or to deprive another of a benefit in excess of \$200, did, in complicity with one another, commit one or more acts relating to JAN VAN HOLT'S and WILLIAM PRICE'S office, but constituting unauthorized exercises of JAN VAN HOLT'S and WILLIAM PRICE'S official functions, knowing that such acts were unauthorized or that they were committed in an unauthorized manner or did refrain from performing a duty imposed upon JAN VAN HOLT and WILLIAM PRICE by law or clearly inherent in the nature of JAN VAN HOLT'S and WILLIAM PRICE'S office, that is JAN VAN HOLT and WILLIAM PRICE, then and there being public servants, to wit: Social Workers with the Atlantic County Department of Human

Services, Division of Intergenerational Services, and SONDRA STEEN, and an individual known to the Grand Jurors, being their accomplices, and JAN VAN HOLT and WILLIAM PRICE having thereby the official functions and duties of a Social Worker, including among others, to perform office and field work necessary to provide referrals and social services for senior citizens, to refrain from using or attempting to use their official position to secure unwarranted privileges or advantages for themselves or others, to perform their duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did knowingly and without authorization access and convert the assets of senior citizens and their estates, who were JAN VAN HOLT's and WILLIAM PRICE'S assigned clients or became known to them through their employment as Social Workers, with purpose to obtain a benefit for JAN VAN HOLT and WILLIAM PRICE or another, in excess of \$200 or to injure or deprive another of a benefit in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Conspiracy - First Degree)

JAN VAN HOLT

SONDRA STEEN

and

WILLIAM PRICE

and another person whose identity is known to the Grand Jurors, between on or about January 1, 2006, and February 7, 2011, at the City of Margate, in the County of Atlantic, elsewhere and within the jurisdiction of this Court, with the purpose of promoting and facilitating the crime of Theft by Deception and Financial Facilitation of Criminal Activity (Money Laundering), did agree together that:

1. One or more of them would engage in conduct which would constitute the aforesaid crime, or

2. One or more of them knowingly would aid in the solicitation, planning, attempt or commission of said crime, that is:

A. Financial Facilitation, in that one or more of them would knowingly or purposely engage in transactions involving property with a value of \$500,000 or more, known to be derived from criminal activity, or which a reasonable person would believe to be derived from criminal activity, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or

disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2) (a).

B. Official Misconduct, in that one or more of them, being a public servant, would acting with a purpose to obtain a benefit for themselves or another, or both, in excess of \$200 or to injure or to deprive another of a benefit in excess of \$200, did, in complicity with one another, commit one or more acts relating to JAN VAN HOLT'S and WILLIAM PRICE'S office, but constituting unauthorized exercises of JAN VAN HOLT'S and WILLIAM PRICE'S official functions, knowing that such acts were unauthorized or that they were committed in an unauthorized manner or did refrain from performing a duty imposed upon JAN VAN HOLT and WILLIAM PRICE by law or clearly inherent in the nature of JAN VAN HOLT'S and WILLIAM PRICE'S office, that is JAN VAN HOLT and WILLIAM PRICE, then and there being public servants, to wit: Social Workers with the Atlantic County Department of Human Services, Division of Intergenerational Services, and SONDR A STEEN, and an individual known to the Grand Jurors, being their accomplices, and JAN VAN HOLT and WILLIAM PRICE having thereby the official functions and duties of a Social Worker, including among others, to perform office and field work necessary to provide referrals and social services for senior citizens, to refrain from using or attempting to use their official position to secure unwarranted privileges or advantages for themselves or others, to perform

their duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did knowingly and without authorization access and convert the assets of senior citizens and their estates, who were JAN VAN HOLT's and WILLIAM PRICE'S assigned clients or became known to them through their employment as Social Workers, with purpose to obtain a benefit for JAN VAN HOLT and WILLIAM PRICE or another, in excess of \$200 or to injure or deprive another of a benefit in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2.

C. Theft by Deception, in that one or more of them would purposely obtain the property of another, in the amount of \$75,000 or more, by deception, by creating or reinforcing a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4.

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 SIX

(Financial Facilitation - First Degree)

JAN VAN HOLT

SONDRA STEEN

and

WILLIAM PRICE

and another person whose identity is known to the Grand Jurors, between on or about January 1, 2006, and February 7, 2011, at the City of Margate, in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did commit the offense of financial facilitation of criminal activity, in that the said JAN VAN HOLT, SONDRA STEEN, WILLIAM PRICE and another person whose identity is known to the Grand Jurors, did engage in transactions involving property with a value of \$500,000 or more, known or which a reasonable person would believe to be derived from criminal activity, that is Theft by Deception, contrary to the provisions of N.J.S.A. 2C:20-4, and Official Misconduct, contrary to the provisions of N.J.S.A. 2C:30-2, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is JAN VAN HOLT, SONDRA STEEN, WILLIAM PRICE and another person whose identity is known to the Grand Jurors, did access and convert the assets of "T.K." and "M.K." for their own use, contrary to the

provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2) (a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Theft by Deception - Second Degree)

JAN VAN HOLT

SONDRA STEEN

and

WILLIAM PRICE

and another person whose identity is known to the Grand Jurors, between on or about January 1, 2006, and February 7, 2011, at the City of Margate, in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposely obtain the property of another, in an amount of \$75,000 or more, by deception, that is JAN VAN HOLT, SONDRA STEEN, WILLIAM PRICE and another person whose identity is known to the Grand Jurors did create or reinforce the false impression that they were authorized to access and convert the assets of "T.K." and "M.K." for their own use,

WHEREAS IN TRUTH AND IN FACT, as JAN VAN HOLT, SONDRA STEEN, WILLIAM PRICE and another person whose identity is known to the Grand Jurors, well knew, they were not authorized to access and convert the assets of "T.K." and "M.K." in an amount in excess of \$75,000, for their own use, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2 and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Conspiracy - Second Degree)

JAN VAN HOLT

SONDRA STEEN

and

SUSAN HAMLETT

between on or about December 1, 2009, and December 20, 2012, at the City of Northfield, at the City of Ventnor, all in the County of Atlantic, elsewhere and within the jurisdiction of this Court, with the purpose of promoting and facilitating the crime of Theft by Deception and Financial Facilitation of Criminal Activity (Money Laundering), did agree together that:

1. One or more of them would engage in conduct which would constitute the aforesaid crime, or

2. One or more of them knowingly would aid in the solicitation, planning, attempt or commission of said crime, that is:

A. Financial Facilitation, in that one or more of them would knowingly or purposely engage in transactions involving property with a value of \$75,000 or more, known to be derived from criminal activity, or which a reasonable person would believe to be derived from criminal activity, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of

the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2)(a).

B. Theft by Deception, in that one or more of them would purposely obtain the property of another, in the amount of \$75,000 or more, by deception, by creating or reinforcing a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4.

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 NINE

(Financial Facilitation - Second Degree)

JAN VAN HOLT

SONDRA STEEN

and

SUSAN HAMLETT

between on or about December 1, 2009, and December 20, 2012, at the City of Northfield, at the City of Ventnor, all in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did commit the offense of financial facilitation of criminal activity, in that the said JAN VAN HOLT, SONDRA STEEN, and SUSAN HAMLETT, did engage in transactions involving property with a value of \$75,000 or more, known or which a reasonable person would believe to be derived from criminal activity, that is Theft by Deception, contrary to the provisions of N.J.S.A. 2C:20-4, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is JAN VAN HOLT, SONDRA STEEN and SUSAN HAMLETT, did access and convert the assets of "I.S." for their own use, contrary to the provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2) (a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Theft by Deception - Second Degree)

JAN VAN HOLT

SONDRA STEEN

and

SUSAN HAMLETT

between on or about December 1, 2009, and December 20, 2012, at the City of Northfield, at the City of Ventnor, all in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did purposely obtain the property of another, in an amount of \$75,000 or more, by deception, that is JAN VAN HOLT, SONDRA STEEN and SUSAN HAMLETT, did create or reinforce the false impression that they were authorized to access and convert the assets of "I.S." for their own use,

WHEREAS IN TRUTH AND IN FACT, as JAN VAN HOLT, SONDRA STEEN and SUSAN HAMLETT, well knew, they were not authorized to access and convert the assets of "I.S.", in an amount in excess of \$75,000, for their own use, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2 and N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Hindering Apprehension or Prosecution - Third Degree)

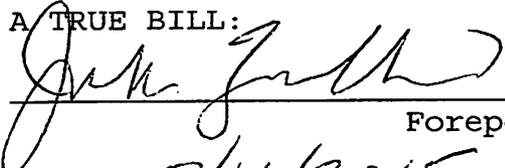
MARIA TERESA SAMON-DACLAN

on or about December 7, 2012, at the City of Northfield, in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did with purpose to hinder the detention, apprehension, investigation, prosecution, conviction or punishment of another for an offense which would constitute a crime of the Second Degree, give false information to a law enforcement officer, contrary to the provisions of N.J.S.A. 2C:29-3(7), and against the peace of this State, the government and dignity of the same.



Elie Honig, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

3/16/2015

FILED

2015

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ666-15-2
Superior Court 15-03-00033-S
Docket Number

STATE OF NEW JERSEY)

 v.)

JAN VAN HOLT)

SONDRA STEEN)

SUSAN HAMLETT)

WILLIAM PRICE)

and)

MARIA TERESA SAMON-DACLAN)

ORDER OF VENUE

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

IT IS ORDERED on this *16th* day of *March*, 2015, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Atlantic be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Atlantic for filing.

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