



reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Endangering the Welfare of a Child)

(Manufacturing of Child Pornography - First Degree)

CRAIG L. WYATT

on or about May 10, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under the age of eighteen, specifically J.G., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which he knew, had reason to know or intended that the prohibited act would be photographed, filmed, reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Endangering the Welfare of a Child)

(Manufacturing of Child Pornography - First Degree)

CRAIG L. WYATT

on or about May 21, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under the age of eighteen, specifically J.G., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which he knew, had reason to know or intended that the prohibited act would be photographed, filmed, reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Endangering the Welfare of a Child)

(Manufacturing of Child Pornography - First Degree)

CRAIG L. WYATT

on or about May 22, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under the age of eighteen, specifically J.G., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which he knew, had reason to know or intended that the prohibited act would be photographed, filmed, reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Endangering the Welfare of a Child)

(Manufacturing of Child Pornography - First Degree)

CRAIG L. WYATT

on or about May 25, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under the age of eighteen, specifically J.G., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which he knew, had reason to know or intended that the prohibited act would be photographed, filmed, reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Endangering the Welfare of a Child)

(Manufacturing of Child Pornography - First Degree)

CRAIG L. WYATT

on or about May 26, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under the age of eighteen, specifically J.G., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which he knew, had reason to know or intended that the prohibited act would be photographed, filmed, reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Endangering the Welfare of a Child)

(Manufacturing of Child Pornography - First Degree)

CRAIG L. WYATT

on or about May 28, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under the age of eighteen, specifically J.G., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which he knew, had reason to know or intended that the prohibited act would be photographed, filmed, reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Endangering the Welfare of a Child)

(Manufacturing of Child Pornography - First Degree)

CRAIG L. WYATT

on or about May 31, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under the age of eighteen, specifically J.G., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which he knew, had reason to know or intended that the prohibited act would be photographed, filmed, reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Endangering the Welfare of a Child)

(Manufacturing of Child Pornography - First Degree)

CRAIG L. WYATT

on or about June 2, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under the age of eighteen, specifically J.G., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which he knew, had reason to know or intended that the prohibited act would be photographed, filmed, reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Endangering the Welfare of a Child)

(Manufacturing of Child Pornography - First Degree)

CRAIG L. WYATT

on or about June 8, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under the age of eighteen, specifically J.G., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which he knew, had reason to know or intended that the prohibited act would be photographed, filmed, reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Theft by Extortion - Second Degree)

CRAIG L. WYATT

on or about May 9, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did purposely and unlawfully obtain the property of another, specifically, sexually explicit photographs of J.G., by purposely threatening to physically confine or restrain J.G., or commit any other criminal offense, contrary to the provisions of N.J.S.A. 2C:20-5a, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Theft by Extortion - Second Degree)

CRAIG L. WYATT

on or about May 10, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did purposely and unlawfully obtain the property of another, specifically, sexually explicit photographs of J.G., by purposely threatening to physically confine or restrain J.G., or commit any other criminal offense, contrary to the provisions of N.J.S.A. 2C:20-5a, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Theft by Extortion - Second Degree)

CRAIG L. WYATT

on or about May 18, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did purposely and unlawfully obtain the property of another, specifically, sexually explicit photographs of J.G., by purposely threatening to physically confine or restrain J.G., or commit any other criminal offense, contrary to the provisions of N.J.S.A. 2C:20-5a, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Criminal Coercion - Third Degree)

CRAIG L. WYATT

on or about May 10, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did, with purpose to unlawfully restrict another's freedom of action to engage or refrain from engaging in conduct, threaten to expose any secret, specifically, sexually explicit photographs of J.G., which would tend to subject J.G. to hatred, contempt or ridicule, contrary to the provisions of N.J.S.A. 2C:13-5a(3), and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Criminal Coercion - Third Degree)

CRAIG L. WYATT

on or about September 1, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did, with purpose to unlawfully restrict another's freedom of action to engage or refrain from engaging in conduct, threaten to expose any secret, specifically, sexually explicit photographs of J.G., which would tend to subject J.G. to hatred, contempt or ridicule, contrary to the provisions of N.J.S.A. 2C:13-5a(3), and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Criminal Coercion - Third Degree)

CRAIG L. WYATT

on or about October 1, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did, with purpose to unlawfully restrict another's freedom of action to engage or refrain from engaging in conduct, threaten to expose any secret, specifically, sexually explicit photographs of J.G., which would tend to subject J.G. to hatred, contempt or ridicule, contrary to the provisions of N.J.S.A. 2C:13-5a(3), and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Endangering the Welfare of a Child)

(Possession of Child Pornography - Third Degree)

CRAIG L. WYATT

on or about October 31, 2014, at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly possess, view, or have under his control, through any means, including the Internet, items depicting the sexual exploitation or abuse of a child, as defined by N.J.S.A. 2C:24-4b(1), contrary to the provisions of N.J.S.A. 2C:24-4b(5)(b), and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Terroristic Threats - Third Degree)

CRAIG L. WYATT

between on or about May 9, 2014 and on or about October 31, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did threaten to commit a crime of violence with the purpose to terrorize J.G., contrary to the provisions of N.J.S.A. 2C:12-3a, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Cyber-Harassment - Fourth Degree)

CRAIG L. WYATT

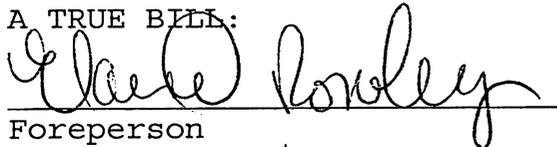
between on or about May 9, 2014 and on or about October 31, 2014, at the Township of Willingboro and at the Township of Riverside, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did, while making a communication in an online capacity via any electronic device or through a social networking site, and with the purpose to harass another, threaten to inflict injury or physical harm to J.G., contrary to the provisions of N.J.S.A. 2C:33-4.1a(1), and against the peace of this State, the government and dignity of the same.



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Christine Hoffman, AAG  
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: November 17, 2015

**FILED**  
NOV 17 2015  
State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ677-15-6  
Superior Court  
Docket Number 15-11-00178-S

STATE OF NEW JERSEY )  
v. )  
CRAIG L. WYATT )

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 *17<sup>th</sup>* day of *November*, 2015, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Burlington 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 Burlington for filing.

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