

**FILED**

OCT 16 2013

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ643-13-14

Superior Court

Docket Number 13-10-00197-S

STATE OF NEW JERSEY

v.

ALLENE MCGHEE

and

IRVING FRYAR

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)  
)  
)  
)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

ALLENE MCGHEE

and

IRVING FRYAR

between on or about October 20, 2009, and on or about January 14, 2010, at the Township of Willingboro, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of Theft by Deception, did conspire and agree with a person whose identity is known to the Grand Jurors, who is named a coconspirator but not as a defendant herein, that:

A. One or more of them would engage in the conduct which

would constitute the aforesaid crime, or an attempt or solicitation to commit such crime; or

B. One or more of them would aid in the planning, attempt, solicitation, or commission of the aforesaid crime, that is:

1. Theft by Deception, in that one or more of them would purposely obtain property of another by deception, by creating or reinforcing a false impression, in an amount of \$75,000 or more, contrary to N.J.S.A. 2C:20-4a.

All in violation of the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Second Degree)

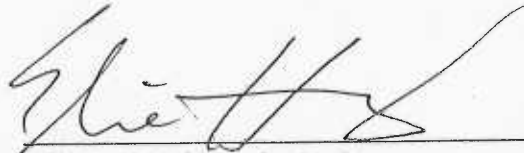
ALLENE MCGHEE

and

IRVING FRYAR

between on or about October 20, 2009, and on or about January 14, 2010, at the Township of Willingboro, in the County of Burlington, at the Township of Robbinsville, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of another, having a value of \$75,000 or more, by deception; that is, the said ALLENE MCGHEE and IRVING FRYAR, did purposely obtain the property of Lincoln Mortgage Company, Susquehanna Bank, Beneficial Bank, Cornerstone Bank, The Bank, Sun National Bank and Roma Bank in an amount of \$75,000 or more by deception, that is: (1) by submitting or causing to be submitted false mortgage loan applications to aforesaid lending institutions thereby creating or reinforcing false impressions as to the financial condition of ALLENE MCGHEE; and (2) by creating or reinforcing false impressions that property located at 104 Glenview Lane, Willingboro, New Jersey, which was offered by ALLENE MCGHEE and IRVING FRYAR as mortgage security for home equity lines of credit with Susquehanna Bank, Beneficial Bank, Cornerstone Bank, The Bank and Sun National Bank was not subject to any lien other than liens already recorded, thereby causing Susquehanna Bank, Beneficial Bank, Cornerstone Bank, The Bank and

Sun National Bank to issue home equity line of credit (HELOC) loans in an amount of \$75,000 or more, all contrary to the provisions of N.J.S.A. 2C:20-4a, N.J.S.A. 2C:20-2b(1)(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Elie Honig, A.A.G.  
Director  
Division of Criminal Justice

A TRUE BILL.



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, Foreperson

Dated:

10-16-13

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
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STATE OF NEW JERSEY )

v. )

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ORDER OF VENUE

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State Grand Jury Judge

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

IT IS ORDERED on this 16<sup>th</sup> day of October, 2013, 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.*  
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Mary C. Jacobson, A.J.S.C.