

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

FILED
JUN 26 2017
State Grand Jury Judge

State Grand Jury
Number SGJ701-17-6
Superior Court
Docket Number 17-06-00117-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

DAVID L. DUNAWAY JR)

PAIGE E. HUNT)

JAMES LAMONT TUTT)

SHANEL TERRY)

DAVID TERRY)

CAPRICE L. SIMMONS)

AND)

RAHMEEN A. REASON)

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

COUNT ONE

(Conspiracy - First Degree)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

AND

DAVID TERRY

who are named as defendants herein, and other individuals whose identities are both known and unknown to the Grand Jurors, who are co-conspirators, but not named as defendants herein, between on or about June 27, 2012, and on or about March 29, 2016, at the Township of Springfield, at the Township of Hillside, at the Township of Union, and at the City of Rahway, all in the County of Union, at the City of Newark, at the City of East Orange, at the Township of Maplewood, and at the Township of South Orange Village, all in the County of Essex, at the Township of Randolph, and at the Township of Denville, both in the County of Morris, at the Township of Bridgewater, at the Borough of North Plainfield, and at the Township of Franklin, all in the County of Somerset, at the Township of Edison, and at the City of South Amboy, both in the County of Middlesex, at the borough of Teterboro, at the Borough of Rutherford, at the Borough of Lodi, at the Township of Lyndhurst, and at the Borough of Hasbrouk Heights, all in the County of Bergen, at the Borough of Totowa, in the County of Passaic, at the Township of Lakewood, in the County of Ocean, and at the Township of Hazlet, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Financial Facilitation, Theft by Deception,

Identity Theft, Tampering with Public Records and Information, and Forgery, did agree together that:

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

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

1. Financial Facilitation, in that one or more of them would engage in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity, with the intent to promote or facilitate the criminal activity or knowing that the transaction was designed in whole or part to conceal or disguise the nature, ownership or control of the property derived from criminal activity, in an amount of \$500,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25b(2) (a), and N.J.S.A. 2C:21-27a;

2. Theft by Deception, in that one or more of them would purposely obtain property of another, having a value of \$75,000 or more, by deception, contrary to the provisions of N.J.S.A. 2C:20-4(a) and N.J.S.A. 2C:20-2b(1) (a);

3. Theft of Identity, in that one or more of them would obtain personal information pertaining to another person and use that information, or assist another person in using that information, in order to assume the identity of or represent himself as another person, without that person's authorization

and with the purpose to avoid payment of debt or other legal obligation, in an amount of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:21-17a(4) and N.J.S.A. 2C:21-17c(3);

4. Tampering with Public Records or Information, in that one or more of them would knowingly make a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, or make, present, offer for filing or use, any record, document or thing knowing it to be false, and with the purpose that it be taken as a genuine part of information or records belonging to, received or kept by, the government for information or record, or required by law to be kept by others for information of the government, with purpose to defraud or injure, contrary to the provisions of N.J.S.A. 2C:28-7a(1) &(2); and,

5. Forgery, in that one or more of them would, with purpose to defraud anyone, or with knowledge that he or she is facilitating a fraud, utters any writing which he or she knows to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3).

All in violation 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)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

And

DAVID TERRY

between on or about June 27, 2012, and on or about March 11, 2013, at the Borough of North Plainfield, in the County of Somerset, at the Township of Edison, and at the City of South Amboy, in the County of Middlesex, at the Borough of Totowa, in the County of Passaic, and at the Township of Hazlet, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of another, by deception, that is, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY purposely did obtain automobile loans in excess of \$75,000, by creating a false impression that the applicants for the automobile loans intended to repay the loans and by creating a false impression that the applicants for the automobile loans were employed and had income as stated on the application for the automobile loans, for the following vehicles and finance companies: a 2008 Mercedes Benz C300, financed by Wells Fargo Dealer Services; a 2009 Chevrolet

Malibu financed through Santander Consumer USA; a 2013 Honda Accord, financed through American Honda Finance Corporation; 2012 Fisker Karma, financed through First Financial Federal Credit Union; a 2008 Jeep Liberty, financed through Santander Consumer USA; and, a 2011 Honda Pilot financed through American Honda Finance Corporation;

WHEREAS IN TRUTH AND IN FACT, as DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY well knew, the applicants for the automobile loans did not intend to repay the automobile loans, were not employed, and did not have the income stated on the applications for the automobile loans, all contrary to the provisions of N.J.S.A. 2C:20-4, 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.

COUNT THREE

(Theft by Deception - Second Degree)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

And

DAVID TERRY

between on or about June 3, 2013, and on or about June 11, 2013, at the City of Rahway, in the County of Union, and at the Township of Bridgewater, in the County of Somerset, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of another, by deception, that is, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY purposely did obtain fraudulent automobile loans, having an aggregate value of \$75,000 or more, for the following vehicles and finance companies: a 2011 Infiniti FX50 financed through Raritan Bay Federal Credit Union; a 2012 Hyundai Veloster financed through Wells Fargo Dealer Services; a 2011 Jeep Grand Cherokee, financed through BMW Financial Services NA, LLC, DBA Alpha Financial Services; and, a 2012 Mercedes Benz C300 financed through Toyota Motor Credit Corporation, by creating or reinforcing the false impression that:

a. An individual whose identity is known to the Grand Jury and whose initials are "C.D.C.", applied for automobile loans;

b. The automobile loans would be repaid; and,

c. "C.D.C." was employed as a manager with various auto companies with a yearly income of over \$95,000,

WHEREAS IN TRUTH AND IN FACT, as DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY well knew:

a. "C.D.C." was not the person applying for the automobile loans.

b. The automobile loans would not be repaid; and,

c. "C.D.C." was not employed as a manager with various automobile companies earning a yearly income of over \$95,000,

all contrary to the provisions of N.J.S.A. 2C:20-4, 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.

COUNT FOUR

(Theft by Deception - Second Degree)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

And

DAVID TERRY

between on or about November 21, 2012, and on or about January 29, 2016, at the Township of Hillside, in the County of Union, at the Township of Bridgewater, in the County of Somerset, at the Township of Denville, in the County of Morris, and at the Borough of Teterboro, and the City of Hackensack, both in the County of Bergen, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of another, by deception, that is, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, purposely did obtain the following automobiles: a 2008 BMW X5, a 2014 Honda Accord, and a 2009 Mercedes Benz E350, from an individual whose identity is known to the Grand Jury and whose initials are "E.M."; a 2011 Honda Pilot, and a 2007 BMW 3, from an individual whose identity is known to the Grand Jury and whose initials are "M.M."; a 2015 Chevrolet Tahoe, and a 2015 Hyundai Santa Fe from an individual whose identity is known to the Grand Jury and whose initials are

"C.N."; and, a 2012 Chevrolet Traverse from an individual whose identity is known to the Grand Jury and whose initials are "S.W.", by creating or reinforcing the false impression that DAVID L. DUNAWAY JR, would pay off the automobile loans on said vehicles, having an aggregate value of \$75,000 or more,

WHEREAS IN TRUTH AND IN FACT, as DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY well knew, the automobile loans would not be paid off and were not paid off by DAVID L. DUNAWAY, all contrary to the provisions of N.J.S.A. 2C:20-4, 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.

COUNT FIVE

(Financial Facilitation - First Degree)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

And

DAVID TERRY

between on or about November 21, 2012, and on or about March 29, 2016, at the Township of Springfield, at the Township of Union, at the Borough of Mountainside, and at the City of Rahway, all in the County of Union, at the Township of Randolph, in the County of Morris, at the Township of Hazlet, in the County of Monmouth, at the City of East Orange, at the Township of Maplewood, at the City of Newark, and at the Township of South Orange Village, all in the County of Essex, at the Township of Franklin, in the County of Somerset, at the Township of Edison, in the County of Middlesex, at the Borough of Teterboro, at the Borough of Rutherford, at the Borough of Lodi, at the Township of Lyndhurst, and at the Borough of Hasbrouk Heights, all in the County of Bergen, and at the Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, did engage in transactions involving property known, or which a reasonable person would believe, was derived from criminal

activity in an amount in excess of \$500,000 with the intent to facilitate or promote criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, source, ownership or control of the property derived from criminal activity, that is, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, did engage in transactions with the New Jersey Motor Vehicle Commission, by presenting fictitious lien release letters, to obtain duplicate or replacement titles for the following cars and their associated finance companies: a 2008 Mercedes Benz C300, Wells Fargo Dealer Services; a 2009 Chevrolet Malibu, Santander Consumer USA Inc.; a 2012 Fisker Karma, First Financial Federal Credit Union; a 2008 Jeep Liberty, Santander Consumer USA; a 2011 Honda Pilot, American Honda Finance Corporation; a 2013 BMW 650, Santander Consumer USA Inc.; a 2013 Hyundai Santa Fe, Hyundai Motor Finance Company; a 2011 Mercedes Benz S550, Mercedes Benz Financial Services USA; a 2012 Hyundai Veloster, Wells Fargo Dealer Services; a 2011 Jeep Grand Cherokee, BMW Financial Services NA LLC; a 2012 Mercedes Benz C300, Toyota Motor Credit Corporation; a 2013 Nissan Pathfinder, Nissan Motor Acceptance Corporation; a 2008 BMW X5, Westlake Financial Services; a 2014 Honda Accord, American Honda Finance Corporation; a 2009 Mercedes Benz E350, Ally Financial Inc.; a 2011 Honda Pilot, Capital One Auto

Finance; a 2007 BMW 3, Consumer Portfolio Services; a 2015 Chevrolet Tahoe, Americredit Financial Services; and, a 2012 Chevrolet Traverse, Santander Consumer USA Inc., knowing that the above cars were encumbered by liens and were obtained through fictitious loan applications and did sell: a 2008 Mercedes Benz C300, a 2009 Chevrolet Malibu, a 2005 Mercedes Benz CLK, a 2008 Jeep Liberty, a 2013 BMW 650, a 2013 Hyundai Santa Fe, a 2011 Mercedes Benz S550, a 2008 BMW X5, a 2009 Mercedes Benz E350, a 2011 Honda Pilot, a 2012 Hyundai Veloster, a 2011 Jeep Grand Cherokee, a 2012 Mercedes Benz C300, a 2013 Nissan Pathfinder, a 2007 BMW 3 Series, a 2015 Chevrolet Tahoe, a 2015 Hyundai Santa Fe, and a 2012 Chevrolet Traverse, for profit, knowing that the cars had fictitious titles, and were encumbered by liens, contrary to the provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2)(a), N.J.S.A. 2C:21-27a, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft by Deception - Second Degree)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

And

DAVID TERRY

between on or about November 23, 2012, and on or about March 29, 2016, at the Township of Union, at the Borough of Mountainside, and at the City of Rahway, all in the County of Union, at the City of Newark, and at the Township of South Orange Village, both in the County of Essex, at the Township of Franklin, in the County of Somerset, at the Township of Edison, in the County of Middlesex, at the Borough of Teterboro, at the Borough of Rutherford, at the Borough of Lodi, at the Township of Lyndhurst, and at the Borough of Hasbrouk Heights, all in the County of Bergen, and at the Township of Lakewood, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of another, having an aggregate value of \$75,000 or more, by deception, that is, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, purposely did obtain money, by selling the following vehicles: a 2008 Mercedes Benz C300 to an individual

whose identity is known to the Grand Jury and whose initials are "D.M."; a 2009 Chevrolet Malibu to an individual whose identity is known to the Grand Jury and whose initials are "A.D."; a 2005 Mercedes Benz CLK to an individual whose identity is known to the Grand Jury and whose initials are "T.W."; a 2008 Jeep Liberty to Car Group Holdings DBA Webuyanycar; a 2013 BMW 650 to an individual whose identity is known to the Grand Jury and whose initials are H.W.; a 2013 Hyundai Santa Fe to Gregg Glenn Auto Sales; a 2011 Mercedes Benz S550, a 2008 BMW X5, a 2009 Mercedes Benz E350, and, a 2011 Honda Pilot to Smart Auto Sales, LLC; a 2012 Hyundai Veloster to Jersey Motors; a 2011 Jeep Grand Cherokee to Concours Motors, Inc.; a 2012 Mercedes Benz C300, and a 2013 Nissan Pathfinder to ANS Auto Sales; a 2007 BMW 3 Series to S.P.A. Auto Group, LLC; a 2015 Chevrolet Tahoe to S&J Auto Wholesalers; a 2015 Hyundai Santa Fe to Coops Cars LLC; and, a 2012 Chevrolet Traverse to Faraj Auto, and creating or reinforcing the false impression that the vehicles were not encumbered by liens when they were sold,

WHEREAS IN TRUTH AND IN FACT, as DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, well knew, the vehicles were encumbered by liens, all contrary to the provisions of N.J.S.A. 2C:20-4, 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.

COUNT SEVEN

(Theft by Deception - Third Degree)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

And

DAVID TERRY

between on or about April 3, 2013, and on or about April 12, 2013, at the Township of Union, in the County of Union, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of another, by deception, that is, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, purposely did obtain money, having an aggregate value in excess of \$500 but less than \$75,000, by selling a 2011 Honda Pilot, and a 2013 Honda Accord to Car Group Holdings DBA Webuyanycar, and creating a false impression that only \$390.37 remained on the lien for the 2013 Honda Accord, and only \$332.08 remained on the lien for the 2011 Honda Pilot,

WHEREAS IN TRUTH AND IN FACT, as DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, well knew, over \$25,000 was still owed on the lien for each vehicle, all contrary to the provisions of N.J.S.A. 2C:20-4, 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.

COUNT EIGHT

(Theft of Identity - Second Degree)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

And

DAVID TERRY

between on or about June 3, 2013, and on or about November 26, 2013, at City of East Orange, in the County of Essex, and at the Borough of Totowa, in the County of Passaic, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for themselves or others, or to injure or defraud another, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, did obtain personal identifying information pertaining to another person and use that information, or assist another person in using the information, in order to assume the identity of or represent himself as another person, without that person's authorization, and with the purpose to avoid the payment of debt or other legal obligation, and did obtain a benefit in the amount of \$75,000 or more, that is, DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, did impersonate or assume the identities of individuals whose identities are known to the Grand Jury and whose initials are

"C.D.C." and "H.A.", and obtain car loans in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:21-17, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Tampering with Public Records and Information - Third Degree)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

And

DAVID TERRY

between on or about November 21, 2012, and on or about July 23, 2014, at the Township of Springfield, in the County of Union, at the Township of Randolph, in the County of Morris, and, at the City of East Orange, and the Township of Maplewood, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, did knowingly make a false entry in any record or document or thing belonging to, or received by, the government for information or record, or required by law to be kept by others for information of the government, with the purpose to defraud, that is, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, did submit applications to the New Jersey Motor Vehicle Commission for duplicate automobile titles, which falsely stated that no liens existed on the automobiles, contrary to the provisions of N.J.S.A. 2C:28-7a(1), N.J.S.A. 2C:28-7b, and N.J.S.A. 2C:2-6,

and against the peace of this State, the government and dignity
of the same.

COUNT TEN

(Forgery - Fourth Degree)

DAVID L. DUNAWAY JR.

PAIGE E. HUNT

JAMES LAMONT TUTT

SHANEL TERRY

And

DAVID TERRY

between on or about November 21, 2012, and on or about July 23, 2014, at the Township of Springfield, in the County of Union, at the Township of Randolph, in the County of Morris, and at the City of East Orange, and the Township of Maplewood, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, did utter a writing which he or she knew to be forged, that is, DAVID L. DUNAWAY JR, PAIGE E. HUNT, JAMES LAMONT TUTT, SHANEL TERRY, and DAVID TERRY, did utter lien release letters to the New Jersey Motor Vehicle Commission, which appeared to be notarized by an individual whose identity is known to the Grand Jury and whose initials are "C.T.", and which he or she knew to be forged, contrary to the provisions of N.J.S.A. 2C:21-1a(3), N.J.S.A. 2C:21-7b, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Theft by Deception - Third Degree)

DAVID L. DUNAWAY JR.

between on or about September 9, 2014, and on or about January 30, 2015, at the City of Newark, in the County of Essex, at the Township of Roxbury, in the County of Morris, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of another, having an aggregate value in excess of \$500 but less than \$75,000, by deception, that is, DAVID L. DUNAWAY JR. purposely did obtain \$2,000 from an individual whose identity is known to the Grand Jury and whose initials are "T.C.", and \$4500 from an individual whose identity is known to the Grand Jury and whose initials are "C.N.", by creating or reinforcing the false impression that DAVID L. DUNAWAY JR. had paid off a lien, with an approximate value of \$18,069.81, on a 2011 Nissan Altima belonging to "T.C.", and a lien, with an approximate value of \$15,000, on a 2008 Infiniti belonging to "C.N.", and that DUNAWAY was thereby entitled to the proceeds of the sale of the 2011 Nissan Altima and 2008 Infiniti,

WHEREAS IN TRUTH AND IN FACT, as DAVID L. DUNAWAY JR. well knew, he did not pay off these liens, and therefore was not entitled to any of the proceeds of the sale of those vehicles, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-

2b(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 TWELVE

(Theft by Deception - Third Degree)

CAPRICE L. SIMMONS

And

RAHMEEN A. REASON

on or about January 29, 2016, at the City of Rahway, in the County of Union, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of another, having a value in excess of \$500 but less than \$75,000, by deception, that is, CAPRICE L. SIMMONS and RAHMEEN A. REASON did obtain an automobile loan from Santander Consumer USA, by submitting an application, in which CAPRICE L. SIMMONS stated that she was employed as an accountant for Belmont with a salary of \$147,000 per year, and RAHMEEN A. REASON did state that he was a manager of East Coast Auto Sport, with a salary of \$167,000 per year,

WHEREAS IN TRUTH AND IN FACT, as CAPRICE L. SIMMONS and RAHMEEN A. REASON well knew, SIMMONS was not employed by Belmont earning \$147,000 per year and REASON was not employed by East Coast Auto Sport earning \$167,000 per year, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(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 THIRTEEN

(Tampering with Public Records and Information - Third Degree)

CAPRICE L. SIMMONS

And

RAHMEEN A. REASON

between on or about January 29, 2016 and on or about February 1, 2016, at the Township of Rahway, in the County of Union, and at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a false entry in any record or document or thing belonging to, or received by, the government for information or record, or required by law to be kept by others for information of the government, with the purpose to defraud, specifically, CAPRICE L. SIMMONS and RAHMEEN A. REASON did submit an application to the New Jersey Motor Vehicle Commission for a duplicate automobile title, which falsely stated that no lien existed on a BMW 650, contrary to the provisions of N.J.S.A. 2C:28-7a(1), N.J.S.A. 2C:28-7b, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

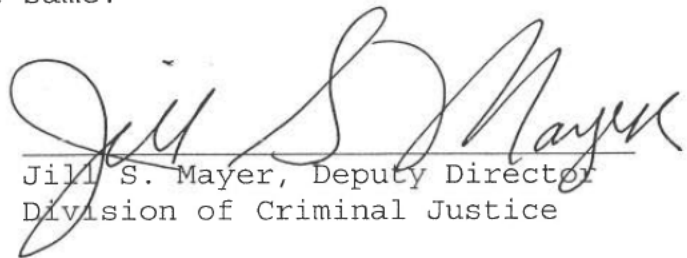
COUNT FOURTEEN

(Theft by Deception - Third Degree)

ROBERT RIVERA

on or about April 14, 2015, at the Borough of Lodi, in the County of Bergen, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of another, having a value in excess of \$500 but less than \$75,000, by deception, that is, purposely did obtain money from S&J Auto Wholesalers, in exchange for a 2015 Chevrolet Tahoe, by creating or reinforcing the false impression that no lien existed on the 2015 Chevrolet Tahoe,

WHEREAS IN TRUTH AND IN FACT, as well knew, the 2015 Chevrolet Tahoe was encumbered with a lien, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.


Jill S. Mayer, Deputy Director
Division of Criminal Justice

A TRUE BILL:

Ant crew

Foreperson

Dated: 6/29/17

FILED
JUN 26 2017
State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ701-17-6
Superior Court
Docket Number 17-06-00117-S

STATE OF NEW JERSEY)
v.)
DAVID L. DUNAWAY, JR.)
PAIGE E. HUNT)
JAMES LAMONT TUTT)
SHANEL TERRY)
DAVID TERRY)
CAPRICE L. SIMMONS)
and)
RAHMEEN A. REASON)

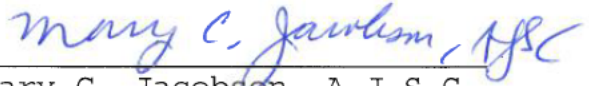
ORDER OF VENUE

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

IT IS ORDERED on this 26th day of June, 2017, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Union 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 Union for filing.


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