

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

FILED

APR 13 2018

State Grand Jury Judge

State Grand Jury

Number SGJ715-18-4-S

Superior Court

Docket Number 18-04-00059-S

STATE OF NEW JERSEY)

v.)

SUPERSEDING INDICTMENT

OSHER EISEMANN)

and)

SERVICES FOR HIDDEN)
INTELLIGENCE, LLC.

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

COUNT ONE

(Corruption of Public Resources - First Degree)

OSHER EISEMANN

and

SERVICES FOR HIDDEN INTELLIGENCE, LLC

between on or about July 21, 2011, and on or about April 30,
2015, at the City of Edison, in the County of Middlesex,
elsewhere, and within the jurisdiction of this Court, did commit
the offense of Corruption of Public Resources, that is, the said
OSHER EISEMANN and SERVICES FOR HIDDEN INTELLIGENCE, LLC, with

respect to a public resource which was subject to an obligation to be used to for a specified purpose or purposes, to wit: to perform or facilitate the performance of a governmental function or public service, did knowingly use or make disposition of that public resource or any portion thereof for an unauthorized purpose, to wit: the said OSHER EISEMANN and SERVICES FOR HIDDEN INTELLIGENCE, LLC did knowingly use public funds of \$500,000 or more, to wit: approximately \$779,000, subject to an obligation to be used for the specific purpose of paying the reasonable, ordinary and necessary costs of educating students at a private school for the handicapped, which purpose was a governmental function or public service, for one or more unauthorized purposes, in violation of N.J.S.A. 2C:27-12(a)(1) and N.J.S.A. 2C:2-6, and against the peace of this State, the government, and dignity of the same.

COUNT TWO

(Theft by Unlawful Taking - Second Degree)

OSHER EISEMANN

and

SERVICES FOR HIDDEN INTELLIGENCE, LLC

between on or about July 21, 2011 and on or about April 30, 2015, at the City of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly did unlawfully take or exercise unlawful control over the movable property of one or more public school districts in the State of New Jersey, as identified to the Grand Jury, that is, funds in an amount of \$75,000 or more, to wit: approximately \$979,000 with the purpose to deprive the owner thereof, contrary to the provisions of N.J.S.A. 2C:20-3 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Financial Facilitation of Criminal Activity - Second Degree)

OSHER EISEMANN

and

SERVICES FOR HIDDEN INTELLIGENCE, LLC

between on or about March 1, 2015, and on or about April 30, 2015, at the City of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, did engage in one or more transactions involving property, to wit: funds of \$75,000 or more, which the said OSHER EISEMANN and SERVICES FOR HIDDEN INTELLIGENCE, LLC knew or which a reasonable person would believe to be derived from criminal activity to wit: Theft By Unlawful Taking, Misapplication of Entrusted Property or Property of Government, or Misconduct By Corporate Official, with the intent to facilitate or promote the criminal activity or knowing that the transaction(s) 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 the said OSHER EISEMANN or SERVICES FOR HIDDEN INTELLIGENCE, LLC, did transfer \$75,000 or more in funds paid or donated to a private school for the handicapped, as identified to the Grand Jury, knowing that it was stolen or misapplied, to one or more entities or persons for the purpose of concealing or disguising the nature, location, source, ownership or control of

the funds, contrary to the provisions of N.J.S.A. 2C:21-25(b),
N.J.S.A. 2C:21-27 and N.J.S.A. 2C:2-6, and against the peace of
this State, the government and dignity of the same.

COUNT FOUR

(Misapplication of Entrusted Property and Property of Government
- Second Degree)

OSHER EISEMANN

and

SERVICES FOR HIDDEN INTELLIGENCE, LLC

between on or about July 21, 2011 and on or about April 30, 2015, at the City of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly did apply or dispose of property, that is funds belonging to the government, to wit: approximately \$979,000 in public funds belonging to one or more public school districts in the State of New Jersey, as identified to the Grand Jury, in a manner which the said OSHER EISEMANN and SERVICES FOR HIDDEN INTELLIGENCE, LLC knew was unlawful and involved substantial risk of loss or detriment to the owner of the property or to a person for whose benefit the property was entrusted, thereby deriving a benefit of approximately \$979,000, contrary to the provisions of N.J.S.A. 2C:21-15 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

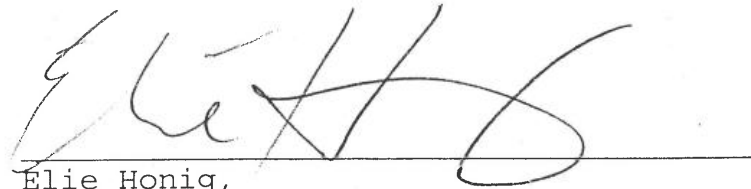
COUNT FIVE

(Misconduct by Corporate Official - Second Degree)

OSHER EISEMANN

between on or about July 21, 2011 and on or about April 30, 2015, at the City of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did use, control, or operate a corporation for the furtherance or promotion of a criminal object, thereby deriving a benefit for himself or another in whom he was interested in excess of \$75,000, to wit: the said OSHER EISEMANN, being an officer, a high managerial employee, an employee or a shareholder, did use, control, or operate SERVICES FOR HIDDEN INTELLIGENCE, LLC, a corporation of the State of New Jersey, for the furtherance or promotion of the criminal objects of: (1) Corruption of Public Resources, in violation of N.J.S.A. 2C:27-12, (2) Theft by Unlawful Taking or Disposition, in violation of N.J.S.A. 2C:20-3(a), (3) Financial Facilitation of Criminal Activity, in violation of N.J.S.A. 2C:21-25 and, (4) Misapplication of Entrusted Property and Property of Government, in violation of N.J.S.A. 2C:21-15; contrary to the provisions of

N.J.S.A. 2C:21-9(c), and against the peace of this State, the government and dignity of the same.



Elie Honig,
Director, Division of Criminal Justice

A TRUE BILL:

William H. Conway
, Foreperson

Dated: 4/13/18

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OSHER EISEMANN)

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SERVICES FOR HIDDEN)
INTELLIGENCE, LLC)

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 *13th* day of *April*, 2018, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Middlesex 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 Middlesex for filing.

Mary C. Jacobson

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