

SUPERIOR COURT OF N.J.  
FILED  
FEB 05 2007  
*Richard J. Pata*  
Clerk

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 531-06-2

Superior Court

Docket Number 07-02-00014-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

ENOS BLAKE )

also known as )  
"GEORGE" BLAKE )

and )

ANNA CAROL LABBE )

also known as )  
"CAROL" LABBE )

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

COUNT ONE

(Theft by Deception - Second Degree)

ENOS BLAKE

and

ANNA CAROL LABBE

between in or about January, 1999, and in or about February,  
2006, at the City of Trenton, and at the Township of East  
Windsor, in the County of Mercer, and at the Township of Edison,  
in the County of Middlesex, elsewhere, and within the  
jurisdiction of this Court, purposely did obtain property of

another in excess of \$75,000 by deception, that is, the said ENOS BLAKE, Vice President of Operations, and ANNA CAROL LABBE, Operations Manager, purposely caused invoices submitted to the State of New Jersey in connection with work performed by their employer, OSI Collection Services, Inc. ("OSI"), under contract to the State of New Jersey, Department of the Treasury, to be paid for work either not allowed to be charged to the State under the applicable contract, or billed to the State of New Jersey at hourly pay rates higher than the pay rates applicable to certain persons who performed work under the applicable contract, in an amount of wrongful billing totaling approximately \$1,184,662.81, by creating the false impression that the invoices accurately identified all employees who performed the work for which the State had agreed to pay, as defined by the relevant contract, and accurately identified the job titles and billing rates applicable to certain of the employees of OSI,

WHEREAS, in truth and in fact, as the said ENOS BLAKE and ANNA CAROL LABBE well knew, the invoices which they caused to be submitted to the State of New Jersey contained false information concerning either the identities of all those employees of OSI who performed work for which the State of New Jersey had agreed to pay under the applicable contract, or false information concerning the job titles and rates of pay of certain employees who performed the work, contrary to the provisions of N.J.S.A.

2C:20-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Misconduct by Corporate Official - Second Degree)

ENOS BLAKE  
and

ANNA CAROL LABBE

between in or about January, 1999, and in or about February, 2006, at the City of Trenton, and at the Township of East Windsor, in the County of Mercer, and at the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly used a corporation for the furtherance or promotion of a criminal object, that is, the said ENOS BLAKE, Vice President of Operations, and ANNA CAROL LABBE, Operations Manager, used OSI Collection Services, Inc. ("OSI"), their employer, to further or promote the crime of Theft by Deception, by submitting invoices in the name of OSI to the State of New Jersey for work performed by OSI under contract with the State of New Jersey, which invoices either falsely stated that certain employees of OSI had performed work allowed by contract to be billed to the State of New Jersey, or falsely stated a job title and rate of billing higher than that actually applicable to certain persons who performed work for the State of New Jersey, contrary to the provisions of N.J.S.A. 2C:21-9c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(False Contract Payment Claims - Second Degree)

ENOS BLAKE

and

ANNA CAROL LABBE

between in or about January, 1999, and in or about February, 2006, at the City of Trenton, and at the Township of East Windsor, in the County of Mercer, and at the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly submitted to the government claims for payment for performance of a government contract, totaling approximately \$985,414.02, knowing such claims to be false, fictitious, or fraudulent, that is, the said ENOS BLAKE, Vice President of Operations, and ANNA CAROL LABBE, Operations Manager, knowingly submitted claims on behalf of their employer, OSI Collection Services, Inc. ("OSI"), that included false, fictitious or fraudulent statements regarding the performance by certain employees of defined work permitted to be billed to the State of New Jersey, or false, fictitious or fraudulent statements regarding the appropriate pay rate at which certain employees of OSI performed work, under a contract with the State of New Jersey, Department of the Treasury, sometimes known as the "Tax Deficiency" contract, or T-1272, contrary to the provisions

of N.J.S.A. 2C:21-34a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(False Contract Payment Claims - Second Degree)

ENOS BLAKE

and

ANNA CAROL LABBE

between in or about January, 1999, and in or about May, 2005, at the City of Trenton, and at the Township of East Windsor, in the County of Mercer, and at the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly submitted to the government claims for payment for performance of a government contract, totaling approximately \$199,248.79, knowing such claims to be false, fictitious, or fraudulent, that is, the said ENOS BLAKE, Vice President of Operations, and ANNA CAROL LABBE, Operations Manager, knowingly submitted claims on behalf of their employer, OSI Collection Services, Inc. ("OSI"), that included false, fictitious or fraudulent statements regarding the performance by certain employees of defined work permitted to be billed to the State of New Jersey, or false, fictitious or fraudulent statements regarding the appropriate pay rate at which certain other employees performed work, under a contract with the State of New Jersey, Department of the Treasury, sometimes known as the "Delinquency" contract, or T-1426, contrary to the

provisions of N.J.S.A. 2C:21-34a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



COUNT FIVE

(False Contract Payment Claims - Second Degree)

ENOS BLAKE

and

ANNA CAROL LABBE

between in or about January, 1999, and in or about January, 2006, at the City of Trenton, and at the Township of East Windsor, in the County of Mercer, and at the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly made material representations that were false in connection with the performance of a government contract, that is, the said ENOS BLAKE, Vice President of Operations, and ANNA CAROL LABBE, Operations Manager, knowingly made false, material representations on behalf of their employer, OSI Collection Services, Inc. ("OSI"), that certain employees of OSI performed work for which the State of New Jersey had agreed to pay, or made false, material representations that certain employees of OSI were billed at the correct pay rate and job title, in connection with the performance of a government contract known as T-1272, which contract was in the approximate amount of \$60,677,848.20, contrary to the provisions of N.J.S.A. 2C:21-34b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(False Contract Payment Claims - Second Degree)

ENOS BLAKE

and

ANNA CAROL LABBE

between in or about January, 1999, and in or about August, 2004, at the City of Trenton, and at the Township of East Windsor, in the County of Mercer, and at the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly made material representations that were false in connection with the with the performance of a government contract, that is, the said ENOS BLAKE, Vice President of Operations, and ANNA CAROL LABBE, Operations Manager, knowingly made false, material representations on behalf of their employer, OSI Collection Services, Inc. ("OSI"), that certain employees of OSI performed work for which the State of New Jersey had agreed to pay, or made false, material representations that certain employees of OSI were billed at the correct pay rate and job title, in connection with the performance of a government contract known as T-1426-70709, which contract was in the approximate amount of \$23,068,662.44, contrary to the provisions of N.J.S.A. 2C:21-34b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(False Contract Payment Claims - Second Degree)

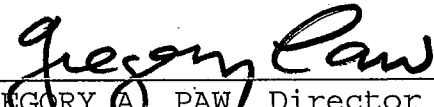
ENOS BLAKE

and

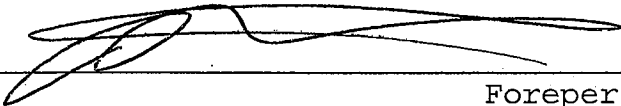
ANNA CAROL LABBE

between in or about September, 2004, and in or about November, 2006, at the City of Trenton, in the County of Mercer, and at the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, knowingly made material representations that were false in connection with the with the performance of a government contract, that is, the said ENOS BLAKE, Vice President of Operations, and ANNA CAROL LABBE, Operations Manager, knowingly made false, material representations on behalf of their employer, OSI Collection Services, Inc. ("OSI"), that certain employees of OSI performed work for which the State of New Jersey had agreed to pay, or made false, material representations that certain employees of OSI were billed at the correct pay rate and job title, in connection with the performance of a government contract known as T-1426-59576, which contract was in the approximate amount of \$9,319,192.67, contrary to the provisions of N.J.S.A. 2C:21-34b

and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

  
\_\_\_\_\_  
GREGORY A. PAW Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

Dated: 2/5/2007