

FILED
OCT 28 2008
SUPERIOR COURT
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ562-08-30

Superior Court

Docket Number 08-10-00247-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

RHONDA COONS)

also known as)

RHONDA LIGE)

also known as)

RHONDA LIGE-COONS)

also known as)

RHONDA COONS-LIGE)

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

COUNT ONE

(Theft by Deception - Third Degree)

RHONDA COONS

between on or about August 1, 2004 and on or about July 31, 2008, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did obtain in excess of \$500 of services, from Verizon New Jersey, by deception, by creating or reinforcing the false impression that services were being procured by or on behalf of Ms. Kelly Irwin, through presentation of Ms. Irwin's personal identifying information in applying for telephone services, submitting the said false application, and thereby obtaining for herself benefits in excess of \$500;

WHEREAS, in truth and in fact, as the said RHONDA COONS well knew, the aforesaid information contained in the application for telephone services was false, contrary to the provisions of N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of same.

COUNT TWO

(Theft by Deception - Fourth Degree)

RHONDA COONS

between on or about August 1, 2004 and on or about January 31, 2005, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did obtain services valued at less than \$500, from Cingular Wireless, by deception, by creating or reinforcing the false impression that services were being procured by or on behalf of Ms. Fayth VanTassel, through presentation of Ms. VanTassel's personal identifying information in applying for cellular telephone services, submitting the said false application, and thereby obtaining for herself benefits of less than \$500;

WHEREAS, in truth and in fact, as the said RHONDA COONS well knew, the aforesaid information contained in the application for telephone services was false, contrary to the provisions of N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of same.

COUNT THREE

(False Statements Made in Procuring Issuance of a Credit Card -
Fourth Degree)

RHONDA COONS

between on or about October 1, 2006 and October 31, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, made or caused to be made, false statements concerning her identity in an application for a credit card from HSBC, specifically presenting and submitting Ms. Fayth VanTassel's identifying information in a credit card application with the purpose of procuring the issuance of a credit card by means of such false statements;

WHEREAS, in truth and in fact, as the said RHONDA COONS well knew, the aforesaid information contained in the application for credit or services was false, contrary to the provisions of N.J.S.A. 2C:21-6b, and against the peace of this State, the government and dignity of same.

COUNT FOUR

(Fraudulent Use of a Credit Card - Third Degree)

RHONDA COONS

between on or about October 1, 2006 and on or about July 31, 2008, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did use a credit card issued in the name of Fayth VanTassel to obtain goods and services of value;

WHEREAS, in truth and in fact, as the said RHONDA COONS well knew, the credit card had been fraudulently obtained, making its use contrary to the provisions of N.J.S.A. 2C:21-6h, and against the peace of this State, the government and dignity of same.

COUNT FIVE

(Criminal Attempt to Commit Theft by Deception - Third Degree)

RHONDA COONS

between on or about November 1, 2006 and on or about April 30, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to obtain in excess of \$500, from Sterling Title Company, by deception, by creating or reinforcing the false impression that Ms. Coons was duly authorized to draw money from Sterling Title Company's bank account maintained at Sun National Bank, by using the account and routing information to execute seven telephone checks drawn upon this account, and thereby attempting to obtaining for herself benefits in excess of \$500;

WHEREAS, in truth and in fact, as the said RHONDA COONS well knew, the aforesaid telephone checks were not authorized by the account's owner, Sterling Title Company, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of same.

COUNT SIX

(Criminal Attempt to Commit Theft by Deception - Third Degree)

RHONDA COONS

between on or about March 1, 2007 and March 31, 2007, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to obtain in excess of \$500, from Patrick DiMartini, by deception, by creating or reinforcing the false impression that Ms. Coons was duly authorized to draw money from Mr. DiMartini's bank account maintained at North Fork Bank, by using the account and routing information to execute a telephone check drawn upon this account, and thereby attempting to obtaining for herself benefits in excess of \$500;

WHEREAS, in truth and in fact, as the said RHONDA COONS well knew, the aforesaid telephone checks were not authorized by the account's owner, Patrick DiMartini, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of same.

COUNT SEVEN

(Criminal Attempt to Commit Theft by Deception - Third Degree)

RHONDA COONS

between or about December 1, 2006 and December 31, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to obtain in excess of \$500, from Miles Winder III, by deception, by creating or reinforcing the false impression that Ms. Coons was duly authorized to draw money from Mr. Winder's bank account maintained at Peapack-Gladstone Bank, by using the account and routing information to execute a telephone checks drawn upon this account, and thereby attempting to obtaining for herself benefits in excess of \$500;

WHEREAS, in truth and in fact, as the said RHONDA COONS well knew, the aforesaid telephone check was not authorized by the account's owner, Miles Winder III, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of same.

COUNT EIGHT

(Criminal Attempt to Commit Theft by Deception - Third Degree)

RHONDA COONS

between on or about November 1, 2006 and November 30, 2006, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did attempt to obtain in excess of \$500, from Hartsough, Kenny, Chase & Sullivan, by deception, by creating or reinforcing the false impression that Ms. Coons was duly authorized to draw money from Hartsough, Kenny, Chase & Sullivan's bank account maintained at Hopewell Community Bank, by using the account and routing information to execute a telephone check drawn upon this account, and thereby attempting to obtaining for herself benefits in excess of \$500;

WHEREAS, in truth and in fact, as the said RHONDA COONS well knew, the aforesaid telephone checks were not authorized by the account's owner, Hartsough, Kenny, Chase & Sullivan, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:5-1, and against the peace of this State, the government and dignity of same.

COUNT NINE

(Identity Theft - Third Degree)

RHONDA COONS

between on or about August 1, 2004 and on or about July 31, 2008, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did obtain the personal identifying information of Kelly Irwin and use that information to assume the identity of Ms. Irwin with the purpose of obtaining a benefit or services from Verizon, New Jersey for herself in excess of \$500, contrary to the provisions of N.J.S.A. 2C:21-17, and against the peace of this State, the government and dignity of same.

COUNT TEN

(Identity Theft - Third Degree)

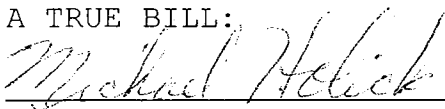
RHONDA COONS

between on or about August 1, 2004 and in or about July 31, 2008, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did obtain the personal identifying information of Fayth VanTassel and use that information to assume the identity of Ms. VanTassel with the purpose of obtaining a credit card from HSBC for herself in excess of \$500, and to obtain cellular services from Cingular Wireless in excess of \$200, contrary to the provisions of N.J.S.A. 2C:21-17, and against the peace of this State, the government and dignity of same.



Boris Moczula, Acting Director
Division of Criminal Justice

A TRUE BILL:



, Foreperson

Dated: Oct 28, 08

FILED

OCT 28 2008

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CLERK'S OFFICE**

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DONALD F. PHELAN
CLERK OF SUPERIOR COURT
SUPERIOR COURT OF N.J.
MERCER COUNTY
RECEIVED AND FILED

OCT 28 2008

Dee Regano

DEE REGANO
DEPUTY CLERK OF SUPERIOR COURT

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

IT IS ORDERED on this 28th day of October, 2008, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer 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 Mercer for filing.

[Signature]
Gerald J. Council J.S.C.