

SUPERIOR COURT OF N.J.
FILED

APR 29 2008

Christine P. Higgins
Acting Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ557-08-5

Superior Court

Docket Number 08-04-00074-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

ROBIN M. BROWN)

also known as)

KELLY D. HUNTER)

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

COUNT ONE

(Use of Personal Identifying Information-Second Degree)

ROBIN M. BROWN

on or about June 9, 2006, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, in obtaining or attempting to obtain a duplicate New Jersey digital Driver's License or other document issued by a governmental agency which could be used as a means of verifying a person's identity, age or any other personal identifying information, did knowingly, exhibit, display or utter a document or other writing which belongs or pertains to a person other than the person who possesses the document, that is, the said ROBIN M. BROWN, in obtaining a duplicate New Jersey digital Driver's License in the name of Kelly D. Hunter issued by the New Jersey Motor Vehicle Commission, which could be

used as a means of verifying a person's identity, age or any other personal identifying information, did knowingly exhibit, display or utter a birth certificate bearing the name of Kelly D. Hunter, contrary to the provisions of N.J.S.A. 2C:21-17.2, against the peace of this State, the government and dignity of the same.

COUNT TWO

(Tampering with Public Records or Information-Third Degree)

ROBIN M. BROWN

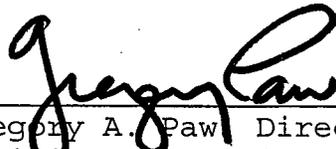
on or about June 9, 2006, at the City of Newark, in the County of Essex, elsewhere and within the jurisdiction of this Court, with the purpose to defraud or injure, did make, present, offer for filing, or use any record, document or thing, knowing it to be false, and with the purpose that it be taken as a genuine part of the information or records 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, that is, the said ROBIN M. BROWN, did make, present, offer for filing or use, a New Jersey Motor Vehicle Commission Application for a duplicate New Jersey digital Driver's License containing the date of birth and other identifying and pedigree information of the purported applicant, Kelly D. Hunter, which information was submitted to the New Jersey Motor Vehicle Commission, contrary to the provisions of N.J.S.A. 2C:28-7a(2), against the peace of this State, the government and dignity of the same.

COUNT THREE

(Forgery-Third Degree)

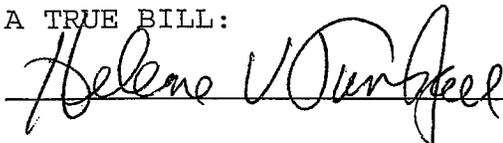
ROBIN M. BROWN

on or about June 9, 2006, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, did utter a writing of another which she knew to be forged, that is, the said ROBIN M. BROWN, with purpose to defraud the New Jersey Motor Vehicle Commission, did present an application to obtain a duplicate New Jersey digital Driver's License purporting to be signed by Kelly D. Hunter, when, in fact, Kelly D. Hunter did not authorize that act, contrary to the provisions of N.J.S.A. 2C:21-1a, against the peace of this State, the government and dignity of same.



Gregory A. Paw Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 4/29/08

DONALD F. PHELAN
CLERK OF SUPERIOR COURT
SUPERIOR COURT OF NEW JERSEY
MERCER COUNTY
RECEIVED AND FILED

APR 29 2008 APR 29 2008

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

Sue Regan
Christina P. Higgins
Acting Clerk

SUE REGAN
DEPUTY CLERK OF SUPERIOR COURT

Grand Jury
Number SGJ557-08-5
Superior Court
Docket Number 08-04-00074-S

STATE OF NEW JERSEY)

v.)

ROBIN M. BROWN)
also known as)
KELLY D. HUNTER)

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 29 day of April, 2008, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Essex 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 Essex for filing.

Gerald J. Council
Gerald J. Council, J.S.C