

**SUPERIOR COURT OF N.J.
FILED**

MAY 15 2008

*Christina P. ...
Acting Clerk*

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ554-08-10

Superior Court
Docket Number 08-05-00090-S

STATE OF NEW JERSEY)
)
) INDICTMENT
LEOCADIA CEPEDA)

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

COUNT ONE

(Receiving Stolen Property - Third Degree)

LEOCADIA CEPEDA

between on or about September 11, 2006 and in or about November, 2006, at the City of Newark, in the County of Essex, at the City of Elizabeth, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did receive or bring into this State movable property of another knowing that it had been stolen, or believing that it had probably been stolen, in an amount in excess of \$500; that is, the said LEOCADIA CEPEDA knowingly did receive or bring into this State property of the State of New Jersey, Department of Health and Senior Services, Office of WIC

Services, that is, WIC food instruments, knowing that the said property had been stolen, or believing that it had probably been stolen, contrary to the provisions of N.J.S.A. 2C:20-7, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft By Deception - Third Degree)

LEOCADIA CEPEDA

between on or about September 11, 2006 and on or about January 10, 2007, at the City of Newark, in the County of Essex, at the City of Elizabeth, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did obtain by deception the property of another in an amount in excess of \$500; that is, the said LEOCADIA CEPEDA purposely did obtain the property of the State of New Jersey, Department of Health and Senior Services, Office of WIC Services, in excess of \$500, by creating or reinforcing the false impression that the defendant, as an authorized WIC vendor, did sell food products to various WIC participants and that information contained in numerous WIC food instruments reflecting those alleged sales was true and correct;

WHEREAS, IN TRUTH AND IN FACT, as the said LEOCADIA CEPEDA well knew, those alleged sales did not occur and the information contained in those WIC food instruments reflecting those alleged sales 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 the same.

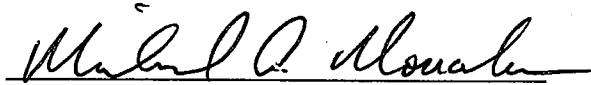
COUNT THREE

(Tampering with Public Records or Information - Third Degree)

LEOCADIA CEPEDA

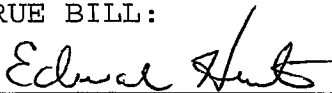
between on or about September 11, 2006 and on or about January 10, 2007, at the City of Newark, in the County of Essex, at the City of Elizabeth, in the County of Union, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did make, present, offer for filing or use a 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 received or kept by the government for information or record, with purpose to defraud or injure another; that is, the said LEOCADIA CEPEDA did make, present or offer numerous WIC food instruments to the Bank of America for deposit in Bank of America account no. 9420992828 in the name of Leocadia J. Cepeda dba G & S Supermarket, knowing the said WIC food instruments to contain false information, with the purpose to defraud or injure the State of New Jersey, Department of Health and Senior Services, Office of WIC Services,

contrary to the provisions of N.J.S.A. 2C:28-7a(2), and against
the peace of this State, the government and dignity of the same.



Michael A. Monahan
Deputy Attorney General
Division of Criminal Justice

A TRUE BILL:



, Foreperson

Dated: 5/15/2008

