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**SUPERIOR COURT
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ563-08-19

Superior Court

Docket Number

09-01-00004-S

STATE OF NEW JERSEY

v.

SANDRA L. BIELANSKI

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INDICTMENT

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

COUNT ONE

(Theft by Deception - Second Degree)

SANDRA L. BIELANSKI

between on or about January 1, 1999, and on or about February 28, 2006, in the City of Trenton, and the Township of East Windsor, in the County of Mercer, and 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 SANDRA L. BIELANSKI, the Sales Director in charge of the New Jersey government accounts, purposely aided or agreed or attempted to aid others in purposely causing 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 \$942,150.22, by creating or reinforcing 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 SANDRA L. BIELANSKI well knew, the invoices which were 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 N.J.S.A. 2C:20-4a, N.J.S.A. 2C:20-2, 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)

SANDRA L. BIELANSKI

between on or about January 1, 1999, and on or about February 28, 2006, in the City of Trenton, and in the Township of East Windsor, in the County of Mercer, and the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely aided or agreed or attempted to aid others in knowingly using a corporation for the furtherance or promotion of a criminal object, that is, the said SANDRA L. BIELANSKI, the Sales Director in charge of the New Jersey government accounts, purposely aided or agreed or attempted to aid others in using OSI Collection Services, Inc. ("OSI"), her 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, from which violation OSI did derive a benefit in excess of \$75,000, contrary to 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)

SANDRA L. BIELANSKI

between on or about June 1, 2000, and on or about February 28, 2006, in the City of Trenton, and the Township of East Windsor, in the County of Mercer, and the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely aided or agreed or attempted to aid others in knowingly submitting to the government claims for payment for performance of a government contract, totaling approximately \$755,331.78, knowing such claims to be false, fictitious, or fraudulent, that is, the said SANDRA L. BIELANSKI, the Sales Director in charge of the New Jersey government accounts, purposely aided or agreed or attempted to aid others in knowingly submitting 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 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)

SANDRA L. BIELANSKI

between on or about June 1, 2000, and on or about May 31, 2005, in the City of Trenton, and the Township of East Windsor, in the County of Mercer, and the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely aided or agreed or attempted to aid others in knowingly submitting to the government claims for payment for performance of a government contract, totaling approximately \$35,356.30, knowing such claims to be false, fictitious, or fraudulent, that is, the said SANDRA L. BIELANSKI, the Sales Director in charge of the New Jersey government accounts, purposely aided or agreed or attempted to aid others in knowingly submitting 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 "Delinquency" contract, or T-1426, contrary to 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 Representations for a Government Contract - Second Degree)

SANDRA L. BIELANSKI

between on or about June 1, 2000, and on or about January 31, 2006, in the City of Trenton, and the Township of East Windsor, in the County of Mercer, and the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely aided or agreed or attempted to aid others in knowingly making material representations that were false in connection with the performance of a government contract, that is, the said SANDRA L. BIELANSKI, the Sales Director in charge of the New Jersey government accounts, purposely aided or agreed or attempted to aid others in knowingly making 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 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 Representations for a Government Contract - Second Degree)

SANDRA L. BIELANSKI

between on or about June 1, 2000, and on or about August 31, 2004, in the City of Trenton, and the Township of East Windsor, in the County of Mercer, and the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely aided or agreed or attempted to aid others in knowingly making material representations that were false in connection with the performance of a government contract, that is, the said SANDRA L. BIELANSKI, the Sales Director in charge of the New Jersey government accounts, purposely aided or agreed or attempted to aid others in knowingly making 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 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.

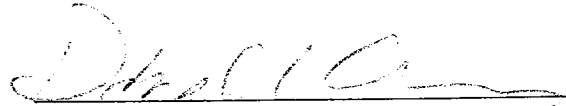
COUNT SEVEN

(False Representations for a Government Contract - Second Degree)

SANDRA L. BIELANSKI

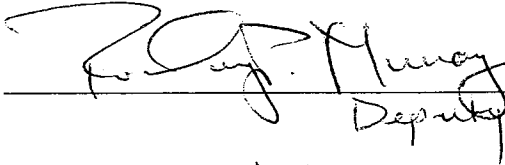
between on or about September 1, 2004, and on or about November 30, 2006, in the City of Trenton, in the County of Mercer, and the Township of Edison, in the County of Middlesex, elsewhere, and within the jurisdiction of this Court, purposely aided or agreed or attempted to aid others in knowingly making material representations that were false in connection with the performance of a government contract, that is, the said SANDRA L. BIELANSKI, the Sales Director in charge of the New Jersey government accounts, purposely aided or agreed or attempted to aid others in knowingly making 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 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.



Deborah L. Gramiccioni, Director
Division of Criminal Justice

A TRUE BILL:



Deputy Foreperson

Dated: 1/7/2009

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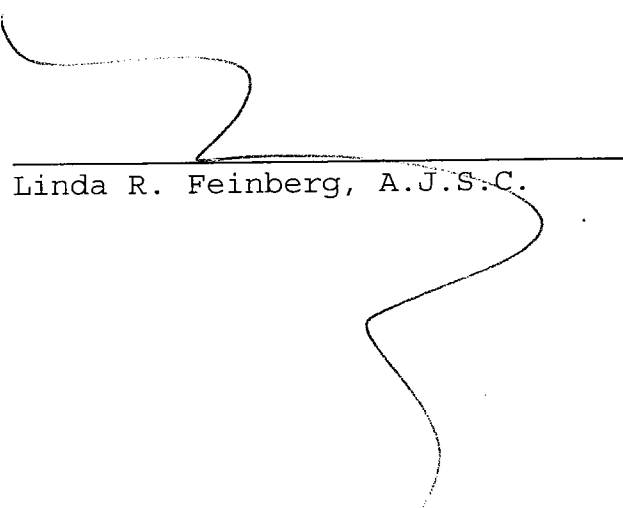
SANDRA L. BIELANSKI)

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 7th day of January, 2009, 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.



Linda R. Feinberg, A.J.S.C.