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

State Grand Jury

Number SGJ576-09-2(2)

Superior Court

Docket Number

09-07-00127-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

JACINTH BUCHANAN)

MARCUS HARRIS)

AL-KHABIR DIGGS)

KEITH F. CHIPEPO)

CHARLES PALMER)

MATTHEW H. RICHARDS)

SAKINAH A. EURE)

)

MICHELLE HORTON)

LINDA JULES)

GREGORY SALTERS)

JANINA M. BOLDEN-MCCALL)

LINDA ROBINSON)

DIANA HUGGINS)

KELLY MONTES)

JAVAIRIA JIHAD)

TAMIKA SNOWDEN)

JAMIE TATE)

and)

CARLTON E. BROWN)

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

COUNT ONE

(Racketeering - Second Degree)

JACINTH BUCHANAN

MARCUS HARRIS

AL-KHABIR DIGGS

KEITH F. CHIPEPO

CHARLES PALMER

MATTHEW H. RICHARDS

SAKINAH A. EURE



MICHELLE HORTON

LINDA JULES

GREGORY SALTERS

JANINA M. BOLDEN-MCCALL

LINDA ROBINSON

DIANA HUGGINS

KELLY MONTES

JAVAIRIA JIHAD

TAMIKA SNOWDEN

JAMIE TATE

and

CARLTON E. BROWN

who are named as the defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, at the times and places herein specified, did commit the crime of racketeering, that is, the defendants and other persons employed by or associated with the enterprise engaged in activities which affected trade or commerce in the State of New Jersey:

1. Purposely or knowingly did conduct or participate directly or indirectly in the conduct of the enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt, contrary to the provisions of N.J.S.A. 2C:41-2c; or

2. With the purpose of promoting or facilitating the commission of the crime of racketeering did conspire and agree together that:

A. One or more of them would engage in conduct which would constitute the crime of racketeering; or

B. One or more of them would aid in the planning, solicitation or commission of the crime of racketeering, that is, to conduct or participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity or collection of an unlawful debt, in violation of N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES AND PLACES

The predicate criminal activity and conspiracy occurred between on or about June 20, 2005, and on or about March 21, 2007, at the Boroughs of Bergenfield, Cresskill, Dumont, Oradell, Paramus, Palisades Park, and Tenefly, at the City of Hackensack, and at the Township of Teaneck, all in the County of Bergen, at the Cities of Beverly and Bordentown, and at the Townships of Evesham (Marlton), Mount Holly, Mount Laurel, and Willingboro, all in the County of Burlington, at the Boroughs of Laurel Springs and Runnemede, and at the Townships of Cherry Hill, Pennsauken, and Voorhees, all in the County of Camden, at the Boroughs of Glen Ridge and Roseland, at the City of Newark, and at the Townships of Bloomfield, Fairfield, Irvington, Millburn, Montclair, and South Orange, all in the County of Essex, at the Borough of Glassboro, at the Townships of Monroe (Williamstown) and Washington (Turnersville and Ganttown), all in the County of Gloucester, at the Borough of Madison, at the Cities of Bayonne and Jersey City, and at the Townships of Harrison and Secaucus, all in the County of Hudson, at the Townships of East Windsor and Ewing, both in the County of Mercer, at the Borough of South Plainfield, at the Townships of Edison, Old Bridge, North Brunswick (Franklin Park), Piscataway, South Brunswick, and Woodbridge (Avenel), all in the County of Middlesex, at the Boroughs of Eatontown, Freehold, Holmdel, Englishtown, and Red

Bank, and at the Townships of Hazlet, Howell, Manalapan, Marlboro, Middletown, Neptune, and Wall, all in the County of Monmouth, at the Boroughs of Madison and Mount Arlington, at the Towns of Dover and Morristown, and at the Townships of East Hanover, Morristown, Mount Olive (Flanders), and Long Hill (Sterling and Gillette), all in the County of Morris, at the Townships of Lakewood and Toms River, both in the County of Ocean, at the City of Clifton, in the County of Passaic, at the Boroughs of Manville, Raritan, Somerville, and Watchung, and at the Townships of Bridgewater, Hillsborough, Morristown, and Warren, all in the County of Somerset, at the Borough of Stanhope, and at the Town of Newton, both in the County of Sussex, at the Boroughs of Garwood, Roselle, and South Plainfield, at the City of Rahway, at the Town of Wesfield, and at the Townships of Berkeley Heights, Cranford, Scotch Plains, Springfield, and Union, all in the County of Union, and at the Town of Hackettstown, in the County of Warren, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

Ernst Francois, Albens Victor, Kenneth Roberts, Woody Armand, Roosevelt Thelusma, Jeff Dieurilus, Bertha Cajuste, Quanise Freeman, Shamira Champagne, Ashley Brown, Vanessa Brown, Ritha Saluste, JACINTH BUCHANAN, MARCUS HARRIS, AL-KHABIR DIGGS, KEITH F. CHIPEPO, CHARLES PALMER, MATTHEW H. RICHARDS, SAKINAH A.

EURE, [REDACTED], MICHELLE HORTON, LINDA JULES, GREGORY
SALTERS, JANINA M. BOLDEN-MCCALL, LINDA ROBINSON, DIANA HUGGINS,
KELLY MONTES, JAVAIRIA JIHAD, TAMIKA SNOWDEN, JAMIE TATE, CARLTON
E. BROWN, and other persons whose identities are known and
unknown to the Grand Jurors, did constitute an enterprise within
the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals
associated in fact, which enterprise was organized to engage in
bank fraud activities through the commission of the crimes of
forgery, theft by deception, uttering forge instruments, and
issuing bad checks.

THE PURPOSES OF THE ENTERPRISE

It was a part of the conspiracy that the purposes of
the enterprise would include the following:

A. Obtaining money from various banking institutions,
including the Bank of America, Commerce Bank, PNC Bank, Wachovia
Bank, Valley National Bank, Sovereign Bank, JP Morgan Chase Bank,
Bank of New York, HSBC Bank, Wells Fargo Bank, Washington Mutual
Bank, Fleet Maine Bank, and Independence Community Bank, engaged
in trade or commerce in the State of New Jersey, for members and
associates of the enterprise through violations of the laws of
the State of New Jersey, including the commission and attempts to
commit the crimes of theft by deception, uttering forged
instruments, issuing bad checks and conspiracies to commit these
offenses.

B. The solicitation and recruitment of others to join or actively participate in the criminal activities of the enterprise by providing copies of payroll checks and personal checks from which members of the enterprise obtained bank routing numbers and other information contained on these checks for use in forging payroll checks for use in a scheme to defraud said banking institutions.

C. The solicitation and recruitment of others to join or actively participate in the criminal activities of the enterprise by cashing forged payroll checks or checks drawn of personal checking accounts, or by depositing forged payroll and personal checks into legitimate bank accounts and withdrawing money from these accounts before the said banking institutions discovered that the forged checks were forged, or the bad checks were drawn on insufficient funds, in order to defraud said banking institutions.

D. To conceal from law enforcement authorities and said banking institutions the existence of the enterprise, the means and locations from which it conducts its affairs, and their involvement in the activities of the enterprise, by instructing participants to deceive law enforcement authorities and banking institutions by claiming that they were the victims of identity theft.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, consisted of at least two incidents of racketeering activity, including Theft by Deception (N.J.S.A. 2C:20-4), Uttering Forged Instruments (N.J.S.A. 2C:20-4), or conspiracies to commit these crimes, as described herein and in Counts Two through One Hundred Twenty-Three of this Indictment.

JACINTH BUCHANAN

did commit the racketeering conduct by the commission of the crimes of Theft by Deception, Attempted Theft by Deception, and Uttering a Forged Instrument, as detailed in Counts Two through Five, Fifty, Fifty-One, and Sixty-Three through Sixty-Eight of this Indictment.

MARCUS HARRIS

did commit the racketeering conduct by the commission of the crimes of Theft by Deception, Attempted Theft by Deception, and Uttering a Forged Instrument, as detailed in Counts Six through Eleven, Fourteen, Twenty-Five through Twenty-Seven, Thirty-Two through Thirty-Four, Thirty-Six through Thirty-Nine, Fifty-Nine, Sixty-Nine through Seventy-Four, Seventy-Nine, Ninety-Four through Ninety-Six, One Hundred One through One Hundred Three, One Hundred Six through One Hundred Nine, and One Hundred Eighteen of this Indictment.

AL-KHABIR DIGGS

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Twelve, Thirteen, Forty-Four, Forty-Five, and Seventy-Five through Seventy-Eight of this Indictment.

KEITH F. CHIPEPO

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Fifteen and Eighty of this Indictment.

CHARLES PALMER

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Sixteen, Twenty-Eight, Twenty-Nine, Eighty-One, Ninety-Seven, and Ninety-Eight of this Indictment.

MATTHEW H. RICHARDS

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Seventeen, Eighteen, Eighty-Two and Eighty-Three of this Indictment.

SAKINAH A. EURE

did commit the racketeering conduct by the commission of the crimes of Attempted Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Fifty-Two, Fifty-Three, Eighty-Four and Eighty-Five of this Indictment.

[REDACTED]

did commit the racketeering conduct by the commission of the crimes of Theft by Deception, Attempted Theft by Deception, and Uttering a Forged Instrument, as detailed in Counts Nineteen, Fifty-Four, Eighty-Six, and Eighty-Seven of this Indictment.

MICHELLE HORTON

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Twenty, Twenty-One, Eighty-Eight, and Eighty-Nine of this Indictment.

LINDA JULES

did commit the racketeering conduct by the commission of the crimes of Theft by Deception, Attempted Theft by Deception, and Uttering a Forged Instrument, as detailed in Counts Twenty-Two through Twenty-Four, Thirty, Thirty-One, Fifty-Five, Ninety through Ninety-Three, Ninety-Nine, and One Hundred of this Indictment.

GREGORY SALTERS

did commit the racketeering conduct by the commission of the crimes of Attempted Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Fifty-Six and One Hundred Four of this Indictment.

JANINA M. BOLDEN-MCCALL

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Thirty-Five and One Hundred Five of this Indictment.

LINDA ROBINSON

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Forty, Forty-Six, Forty-Seven, and One Hundred Ten through One Hundred Twelve of this Indictment.

DIANA HUGGINS

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Forty-One, Forty-Eight, Forty-Nine, and One Hundred Thirteen through One Hundred Fifteen of this Indictment.

KELLY MONTES

did commit the racketeering conduct by the commission of the crimes of Attempted Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Fifty-Seven and One Hundred Sixteen of this Indictment.

JAVAIRIA JIHAD

did commit the racketeering conduct by the commission of the crimes of Attempted Theft by Deception and Uttering a Forged

Instrument, as detailed in Counts Fifty-Eight and One Hundred Seventeen of this Indictment.

TAMIKA SNOWDEN

did commit the racketeering conduct by the commission of the crimes of Theft by Deception, Attempted Theft by Deception, and Uttering a Forged Instrument, as detailed in Counts Forty-Two, Sixty, One Hundred Nineteen and One Hundred Twenty of this Indictment.

JAMIE TATE

did commit the racketeering conduct by the commission of the crimes of Attempted Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Sixty-One, Sixty-Two, One Hundred Twenty-One and One Hundred Twenty-Two of this Indictment.

CARLTON E. BROWN

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Forty-Three and One Hundred Twenty-Three of this Indictment.

All in violation of N.J.S.A. 2C:5-2, N.J.S.A. 2C:41-2c, and N.J.S.A. 2C:41-2d, and against the peace of this State, the government and dignity of the same.

COUNTS TWO THROUGH FORTY-THREE

(Theft by Deception - Third Degree)

JACINTH BUCHANAN

MARCUS HARRIS


AL-KHABIR DIGGS

KEITH F. CHIPEPO

CHARLES PALMER

MATTHEW H. RICHARDS

SAKINAH A. EURE


MICHELLE HORTON

LINDA JULES

GREGORY SALTERS

JANINA M. BOLDEN-MCCALL

LINDA ROBINSON

DIANA HUGGINS

KELLY MONTES

JAVAIRIA JIHAD

TAMIKA SNOWDEN

JAMIE TATE

and

CARLTON E. BROWN

at the times and places set forth herein, elsewhere, and within
the jurisdiction of this Court, purposely did obtain in excess of

\$500 from the specified banking institutions, by deception, that is, by creating or reinforcing the false impression that the specified forged checks were good and negotiable, whereas, in truth and in fact, as the said JACINTH BUCHANAN, MARCUS HARRIS, AL-KHABIR DIGGS, KEITH F. CHIPEPO, CHARLES PALMER, MATTHEW H. RICHARDS, SAKINAH A. EURE, SHERELLE P. BELTON, MICHELLE HORTON, LINDA JULES, GREGORY SALTERS, JANINA M. BOLDEN-MCCALL, LINDA ROBINSON, DIANA HUGGINS, KELLY MONTES, JAVAIRIA JIHAD, TAMIKA SNOWDEN, JAMIE TATE, and CARLTON E. BROWN well knew, the said checks were not good and not negotiable, all as set forth herein and in Count One of this Indictment:

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
2	JACINTH BUCHANAN	12/12/05	Township of Secaucus, County of Hudson	Bank of America	\$4,885.92 (\$4,885.92)	223	C.C.	Jacynth Buchanan
3	JACINTH BUCHANAN	12/12/05	Township of Harrison, County of Hudson	Bank of America	\$4,885.92 (\$4,885.92)	224	C.C.	Jacynth Buchanan
4	JACINTH BUCHANAN	12/13/05	Township of Springfield, County of Union	Bank of America	\$4,250.00 (\$760.00)	750	S.C.	Jacynth Buchanan
5	JACINTH BUCHANAN	12/14/05	Borough of Madison, County of Morris	Bank of America	\$2,500.00 (\$2,500.00)	127	Jacynth Buchanan	Jacynth Buchanan
6	MARCUS HARRIS	5/22/06	Borough of Runnemede, County of Camden	Commerce Bank	\$3,269.32 (\$3,269.32)	1244	PMK Services, LLC	Marcus Harris

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
7	MARCUS HARRIS	5/22/06	Township of Washington, County of Gloucester	Commerce Bank	\$3,269.32 (\$3,269.32)	1246	PMK Services, LLC	Marcus Harris
8	MARCUS HARRIS	6/3/06	Township of Cherry Hill, County of Camden	Commerce Bank	\$3,485.75 (\$3,485.75)	48714	Surety Title Agency of Atlantic County	Marcus Harris
9	MARCUS HARRIS	6/3/06	Township of Mount Laurel, County of Burlington	Commerce Bank	\$3,485.75 (\$3,485.75)	48717	Surety Title Agency of Atlantic County	Marcus Harris
10	MARCUS HARRIS	6/9/06	Township of Marlboro, County of Monmouth	Commerce Bank	\$3,197.95 (\$3,197.95)	48718	Surety Title Agency of Atlantic County	Marcus Harris
11	MARCUS HARRIS	6/11/06	Borough of Eatontown, County of Monmouth	Commerce Bank	\$3,197.95 (\$3,197.95)	48723	Surety Title Agency of Atlantic County	Marcus Harris
12	AL-KHABIR DIGGS	6/28/06	City of Newark, County of Essex	Bank of America	\$750.00 (\$750.00)	100077362	The Valley Hospital Valley Health System	Al-Khabir Diggs
13	AL-KHABIR DIGGS	6/28/06	City of Newark, County of Essex	Bank of America	\$789.67 (\$789.67)	100077384	The Valley Hospital Valley Health System	Al-Khabir Diggs
14	MARCUS HARRIS	7/3/06	Township of Wall, County of Monmouth	Commerce Bank	\$2,800.00 (\$2,800.00)	8195	Township of Cranford	Marcus Harris
15	KEITH F. CHIPEPO	7/18/06	Borough of Oradell, County of Bergen	Bank of America	\$6,200.00 (\$4,900.00)	2752	Park Avenue Talent LTD	Keith F. Chipepo
16	CHARLES PALMER	8/7/06	Avenel, Township of Woodbridge, County of Middlesex	PNC Bank	\$684.13 (\$684.13)	5114826	Allied Barton Spectaguard Acquisition	Charles Palmer
17	MATTHEW RICHARDS	8/14/06	Township of Hillsborough, County of Somerset	PNC Bank	\$976.11 (\$976.11)	5114852	Allied Barton	Matthew H. Richards
18	MATTHEW RICHARDS	8/14/06	Borough of Raritan, County of Somerset	PNC Bank	\$934.41 (\$934.41)	5114853	Allied Barton	Matthew H. Richards

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
19		8/14/06	Borough of Red Bank, County of Monmouth	Bank of America	\$3,380.00 (\$3,200.00)	226	Roosevelt Thelusma	Sherelle P. Belton
20	MICHELLE HORTON	8/17/06	Township of Middletown, County of Monmouth	Bank of America	\$3,000.00 (\$3,000.00)	124	Roosevelt Thelusma	Michelle Horton
21	MICHELLE HORTON	8/17/06	Township of Holmdel, County of Monmouth	Bank of America	\$4,250.00 (\$700.00)	125	Roosevelt Thelusma	Michelle Horton
22	LINDA JULES	8/21/06	Township of Lakewood, County of Ocean	Wachovia Bank	\$2,830.00 (\$2,830.00)	117	Roosevelt Thelusma	Linda Jules
23	LINDA JULES	8/21/06	Township of Howell, County of Monmouth	Wachovia Bank	\$2,000.00 (\$601.30)	124	Roosevelt Thelusma	Linda Jules
24	LINDA JULES	8/22/06	Township of Manalapan, County of Monmouth	Wachovia Bank	\$2,000.00 (\$2,000.00)	241	Roosevelt Thelusma	Linda Jules
25	MARCUS HARRIS	8/25/06	Township of East Windsor, County of Mercer	Commerce Bank	\$2,400.37 (\$2,400.37)	1133	Roseland Spinal Rehabilitation PC	Marcus Harris
26	MARCUS HARRIS	8/28/06	Township of Mount Laurel, County of Burlington	Commerce Bank	\$2,400.00 (\$2,400.00)	1134	Roseland Spinal Rehabilitation PC	Marcus Harris
27	MARCUS HARRIS	8/28/06	Township of Willingboro, County of Burlington	Commerce Bank	\$2,200.00 (\$2,200.00)	42500	Demarite Industries, LLC	Marcus Harris
28	CHARLES PALMER	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$806.29 (\$806.29)	22384	Motivated Security	Charles Palmer
29	CHARLES PALMER	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$831.74 (\$831.74)	22385	Motivated Security	Charles Palmer
30	LINDA JULES	9/1/06	Township of Middletown, County of Monmouth	Commerce Bank	\$2,000.00 (\$2,000.00)	1005	Yademine Compere	Linda Jules

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
31	LINDA JULES	9/1/06	Township of Hazlet, County of Monmouth	Commerce Bank	\$2,000.00 (\$502.00)	1007	Yademine Compere	Linda Jules
32	MARCUS HARRIS	9/11/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,406.54 (\$2,406.54)	7082	Ken Smith Lincoln Mercury	Marcus Harris
33	MARCUS HARRIS	9/11/06	Williamstown, Township of Monroe, County of Gloucester	Commerce Bank	\$2,406.54 (\$2,406.54)	7085	Ken Smith Lincoln Mercury	Marcus Harris
34	MARCUS HARRIS	9/11/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,200.00 (\$2,200.00)	7088	Ken Smith Lincoln Mercury	Marcus Harris
35	JANINA M. BOLDEN- MCCALL	9/24/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,852.88 (\$4,852.88)	209760	The Blood Center of New Jersey, Inc.	Janina M. Bolden- McCall
36	MARCUS HARRIS	9/25/06	Borough of Glassboro, County of Gloucester	Commerce Bank	\$2,375.00 (\$2,375.00)	59035	The Blood Center of New Jersey, Inc.	Marcus Harris
37	MARCUS HARRIS	9/25/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,575.00 (\$2,575.00)	59038	The Blood Center of New Jersey, Inc.	Marcus Harris
38	MARCUS HARRIS	9/25/06	Township of Toms River, County of Ocean	Commerce Bank	\$2,475.00 (\$2,475.00)	59040	The Blood Center of New Jersey, Inc.	Marcus Harris
39	MARCUS HARRIS	9/25/06	Township of Toms River, County of Ocean	Commerce Bank	\$2,375.00 (\$2,375.00)	59044	The Blood Center of New Jersey, Inc.	Marcus Harris
40	LINDA ROBINSON	10/13/06	City of Bayonne, County of Hudson	PNC Bank	\$1,073.56 (\$1,073.56)	162993	Bowles Corporate Services, Inc.	Linda Robinson
41	DIANA HUGGINS	10/16/06	City of Jersey City, County of Hudson	PNC Bank	\$973.65 (\$973.65)	163000	Bowles Corporate Services, Inc.	Diana Huggins
42	TAMIKA SNOWDEN	11/15/06	Township of South Orange, County of Essex	Sovereign Bank	\$986.14 (\$986.14)	116	PGM & Assoc.	Tamika Snowden

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
43	CARLTON E. BROWN	12/6/06	Township of East Hanover, County of Morris	Bank of New York	\$1,484.15 (\$1,484.15)	8943	High Mountain Construction, Inc.	Carlton E. Brown

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

COUNTS FORTY-FOUR THROUGH FORTY-NINE

(Theft by Deception - Fourth Degree)

AL-KHABIR DIGGS

LINDA ROBINSON

and

DIANA HUGGINS

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, purposely did obtain \$200 or more from the specified banking institutions, by deception, that is, by creating or reinforcing the false impression that the specified forged checks were good and negotiable, whereas, in truth and in fact, as the said AL-KHABIR DIGGS, LINDA ROBINSON, and DIANA HUGGINS well knew, the said checks were not good and not negotiable, all as set forth herein and in Count One of this Indictment:

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
44	AL-KHABIR DIGGS	6/27/06	Township of South Orange, County of Essex	Bank of America	\$489.87 (\$489.87)	100077378	The Valley Hospital Valley Health System	Al-Khabir Diggs
45	AL-KHABIR DIGGS	6/28/06	Township of Irvington, County of Essex	Bank of America	\$489.87 (\$489.87)	100077379	The Valley Hospital Valley Health System	Al-Khabir Diggs
46	LINDA ROBINSON	10/11/06	City of Bayonne, County of Hudson	PNC Bank	\$493.74 (\$493.74)	5071213	Allied Barton Security Services	Linda Robinson

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
47	LINDA ROBINSON	10/12/06	City of Bayonne, County of Hudson	PNC Bank	\$497.38 (\$497.38)	5071212	Allied Barton Security Services	Linda Robinson
48	DIANA HUGGINS	10/13/06	City of Clifton, County of Passaic	PNC Bank	\$473.92 (\$473.92)	162989	Bowles Corporate Services, Inc.	Diana Huggins
49	DIANA HUGGINS	10/13/06	City of Clifton, County of Passaic	PNC Bank	\$489.78 (\$489.78)	162990	Bowles Corporate Services, Inc.	Diana Huggins

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

COUNTS FIFTY THROUGH SIXTY-TWO

(Attempted Theft by Deception - Third Degree)

JACINTH BUCHANAN

SAKINAH EURE



LINDA JULES

GREGORY SALTERS

KELLY MONTES

JAVAIRA JIHAD


MARCUS HARRIS

TAMIKA SNOWDEN

and

JAMIE TATE

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, purposely did attempt to obtain in excess of \$500 from the specified banking institutions, by deception, that is, by creating or reinforcing the false impression that the specified forged checks were good and negotiable, whereas, in truth and in fact, as the said JACINTH BUCHANAN, SAKINAH EURE, SHERELLE P. BELTON, LINDA JULES, GREGORY SALTERS, KELLY MONTES, JAVAIRA JIHAD, MARCUS HARRIS, TAMIKA SNOWDEN and JAMIE TATE well knew, the said checks were not good and not negotiable, all as set forth herein, and in Count One of this Indictment:

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
50	JACINTH BUCHANAN	12/14/05	Township of Morristown, County of Morris	Bank of America	\$4,875.00	166	Angelo Felix	Jacynth Buchanan
51	JACINTH BUCHANAN	12/14/05	Township of Irvington, County of Essex	Bank of America	\$2,813.00	167	Angelo Felix	Jacynth Buchanan
52	SAKINAH A. EURE	8/14/06	Township of Piscataway, County of Middlesex	Commerce Bank	\$4,500.00	395	Camilla Mishoe	Sakinah A. Eure
53	SAKINAH A. EURE	8/14/06	Stirling, Township of Long Hill, County of Morris	PNC Bank	\$984.16	5114849	Allied Barton	Sakinah A. Eure
54		8/14/06	Township of Middletown, County of Monmouth	Bank of America	\$3,380.00	225	Roosevelt Thelusma	Sherelle P. Belton
55	LINDA JULES	8/21/06	Township of Toms River, County of Ocean	Wachovia Bank	\$2,000.00	110	Roosevelt Thelusma	Linda Jules
56	GREGORY SALTERS	9/19/06	Township of South Orange, County of Essex	PNC Bank	\$523.64	3369333703	Motivated Security Services	Gregory Salters
57	KELLY MONTES	10/27/06	Borough of Oradell, County of Bergen	Wachovia Bank	\$2,800.00	6225946	Allied Barton Spectaguard Acuisition	Kelly Montes
58	JAVAIRIA JIHAD	10/27/06	Borough of Mount Arlington, County of Morris	Bank of America	\$2,204.35	8178	NJ Democratic State Committee Victory Federal	Javairia Jihad
59	MARCUS HARRIS	10/28/06	Township of Pennsauken, County of Camden	Commerce Bank	\$3,400.64	4677	Kaplow & Co. Insurance	Marcus Harris
60	TAMIKA SNOWDEN	11/15/06	Township of South Orange, County of Essex	Sovereign Bank	\$977.76	115	PGM & Assoc.	Tamika Snowden

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
61	JAMIE TATE	11/17/06	Township of Neptune, County of Monmouth	Bank of America	\$4,800.00	18479	New Jersey Turnpike Authority	Jammie Tate
62	JAMIE TATE	11/20/06	Township of Wall, County of Monmouth	Bank of America	\$4,900.00	77944	Dell Marketing, L.P.	Jammie Tate

contrary to the provisions of N.J.S.A. 2C:5-1, N.J.S.A. 2C:20-4,
and N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT SIXTY-THREE THROUGH ONE HUNDRED TWENTY-THREE

(Uttering a Forged Instrument - Third Degree)

JACINTH BUCHANAN

MARCUS HARRIS


AL-KHABIR DIGGS

KEITH F. CHIPEPO

CHARLES PALMER

MATTHEW H. RICHARDS

SAKINAH A. EURE


MICHELLE HORTON

LINDA JULES

GREGORY SALTERS

JANINA M. BOLDEN-MCCALL

LINDA ROBINSON

DIANA HUGGINS

KELLY MONTES

JAVAIRIA JIHAD

TAMIKA SNOWDEN

JAMIE TATE

and

CARLTON E. BROWN

at the times and places set forth herein, elsewhere, and within
the jurisdiction of this Court, with purpose to defraud or injure

the specified banking institutions, knowingly did utter as true the listed checks, bearing thereon a forged or falsely made signature or endorsement, knowing the same to be forged or falsely made, all as set forth herein, and in Count One of this Indictment:

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
63	JACINTH BUCHANAN	12/12/05	Township of Secaucus, County of Hudson	Bank of America	\$4,885.92	223	C.C.	Jacynth Buchanan
64	JACINTH BUCHANAN	12/12/05	Township of Harrison, County of Hudson	Bank of America	\$4,885.92	224	C.C.	Jacynth Buchanan
65	JACINTH BUCHANAN	12/13/05	Township of Springfield, County of Union	Bank of America	\$4,250.00	750	S.C.	Jacynth Buchanan
66	JACINTH BUCHANAN	12/14/05	Township of Morristown, County of Morris	Bank of America	\$4,875.00	166	Angelo Felix	Jacynth Buchanan
67	JACINTH BUCHANAN	12/14/05	Borough of Madison, County of Morris	Bank of America	\$2,500.00	127	Jacynth Buchanan	Jacynth Buchanan
68	JACINTH BUCHANAN	12/14/05	Township of Irvington, County of Essex	Bank of America	\$2,813.00	167	Angelo Felix	Jacynth Buchanan
69	MARCUS HARRIS	5/22/06	Borough of Runnemede, County of Camden	Commerce Bank	\$3,269.32	1244	PMK Services, LLC	Marcus Harris
70	MARCUS HARRIS	5/22/06	Township of Washington, County of Gloucester	Commerce Bank	\$3,269.32	1246	PMK Services, LLC	Marcus Harris
71	MARCUS HARRIS	6/3/06	Township of Cherry Hill, County of Camden	Commerce Bank	\$3,485.75	48714	Surety Title Agency of Atlantic County	Marcus Harris

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
72	MARCUS HARRIS	6/3/06	Township of Mount Laurel, County of Burlington	Commerce Bank	\$3,485.75	48717	Surety Title Agency of Atlantic County	Marcus Harris
73	MARCUS HARRIS	6/9/06	Township of Marlboro, County of Monmouth	Commerce Bank	\$3,197.95	48718	Surety Title Agency of Atlantic County	Marcus Harris
74	MARCUS HARRIS	6/11/06	Borough of Eatontown, County of Monmouth	Commerce Bank	\$3,197.95	48723	Surety Title Agency of Atlantic County	Marcus Harris
75	AL-KHABIR DIGGS	6/27/06	Township of South Orange, County of Essex	Bank of America	\$489.87	100077378	The Valley Hospital Valley Health System	Al-Khabir Diggs
76	AL-KHABIR DIGGS	6/28/06	City of Newark, County of Essex	Bank of America	\$750.00	100077362	The Valley Hospital Valley Health System	Al-Khabir Diggs
77	AL-KHABIR DIGGS	6/28/06	Township of Irvington, County of Essex	Bank of America	\$489.87	100077379	The Valley Hospital Valley Health System	Al-Khabir Diggs
78	AL-KHABIR DIGGS	6/28/06	City of Newark, County of Essex	Bank of America	\$789.67	100077384	The Valley Hospital Valley Health System	Al-Khabir Diggs
79	MARCUS HARRIS	7/3/06	Township of Wall, County of Monmouth	Commerce Bank	\$2,800.00	8195	Township of Cranford	Marcus Harris
80	KEITH F. CHIPEPO	7/18/06	Borough of Oradell, County of Bergen	Bank of America	\$6,200.00	2752	Park Avenue Talent LTD	Keith F. Chipepo
81	CHARLES PALMER	8/7/06	Avenel, Township of Woodbridge, County of Middlesex	PNC Bank	\$684.13	5114826	Allied Barton Spectaguard Acquisition	Charles Palmer
82	MATTHEW RICHARDS	8/14/06	Township of Hillsborough, County of Somerset	PNC Bank	\$976.11	5114852	Allied Barton	Matthew H. Richards
83	MATTHEW RICHARDS	8/14/06	Borough of Raritan, County of Somerset	PNC Bank	\$934.41	5114853	Allied Barton	Matthew H. Richards


Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
84	SAKINAH A. EURE	8/14/06	Township of Piscataway, County of Middlesex	Commerce Bank	\$4,500.00	395	Camilla Mishoe	Sakinah A. Eure
85	SAKINAH A. EURE	8/14/06	Stirling, Township of Long Hill, County of Morris	PNC Bank	\$984.16	5114849	Allied Barton	Sakinah A. Eure
86		8/14/06	Township of Middletown, County of Monmouth	Bank of America	\$3,380.00	225	Roosevelt Thelusma	Sherelle P. Belton
87		8/14/06	Borough of Red Bank, County of Monmouth	Bank of America	\$3,380.00	226	Roosevelt Thelusma	Sherelle P. Belton
88	MICHELLE HORTON	8/17/06	Township of Middletown, County of Monmouth	Bank of America	\$3,000.00	124	Roosevelt Thelusma	Michelle Horton
89	MICHELLE HORTON	8/17/06	Township of Holmdel, County of Monmouth	Bank of America	\$4,250.00	125	Roosevelt Thelusma	Michelle Horton
90	LINDA JULES	8/21/06	Township of Toms River, County of Ocean	Wachovia Bank	\$2,000.00	110	Roosevelt Thelusma	Linda Jules
91	LINDA JULES	8/21/06	Township of Lakewood, County of Ocean	Wachovia Bank	\$2,830.00	117	Roosevelt Thelusma	Linda Jules
92	LINDA JULES	8/21/06	Township of Howell, County of Monmouth	Wachovia Bank	\$2,000.00	124	Roosevelt Thelusma	Linda Jules
93	LINDA JULES	8/22/06	Township of Manalapan, County of Monmouth	Wachovia Bank	\$2,000.00	241	Roosevelt Thelusma	Linda Jules
94	MARCUS HARRIS	8/25/06	Township of East Windsor, County of Mercer	Commerce Bank	\$2,400.37	1133	Roseland Spinal Rehabilitation PC	Marcus Harris

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
95	MARCUS HARRIS	8/28/06	Township of Mount Laurel, County of Burlington	Commerce Bank	\$2,400.00	1134	Roseland Spinal Rehabilitation PC	Marcus Harris
96	MARCUS HARRIS	8/28/06	Township of Willingboro, County of Burlington	Commerce Bank	\$2,200.00	42500	Demarite Industries, LLC	Marcus Harris
97	CHARLES PALMER	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$806.29	22384	Motivated Security	Charles Palmer
98	CHARLES PALMER	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$831.74	22385	Motivated Security	Charles Palmer
99	LINDA JULES	9/1/06	Township of Middletown, County of Monmouth	Commerce Bank	\$2,000.00	1005	Yademine Compere	Linda Jules
100	LINDA JULES	9/1/06	Township of Hazlet, County of Monmouth	Commerce Bank	\$2,000.00	1007	Yademine Compere	Linda Jules
101	MARCUS HARRIS	9/11/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,406.54	7082	Ken Smith Lincoln Mercury	Marcus Harris
102	MARCUS HARRIS	9/11/06	Williamstown, Township of Monroe, County of Gloucester	Commerce Bank	\$2,406.54	7085	Ken Smith Lincoln Mercury	Marcus Harris
103	MARCUS HARRIS	9/11/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,200.00	7088	Ken Smith Lincoln Mercury	Marcus Harris
104	GREGORY SALTERS	9/19/06	Township of South Orange, County of Essex	PNC Bank	\$523.64	3369333703	Motivated Security Services	Gregory Salters
105	JANINA M. BOLDEN-MCCALL	9/24/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,852.88	209760	The Blood Center of New Jersey, Inc.	Janina M. Bolden-McCall
106	MARCUS HARRIS	9/25/06	Borough of Glassboro, County of Gloucester	Commerce Bank	\$2,375.00	59035	The Blood Center of New Jersey, Inc.	Marcus Harris

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
107	MARCUS HARRIS	9/25/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,575.00	59038	The Blood Center of New Jersey, Inc.	Marcus Harris
108	MARCUS HARRIS	9/25/06	Township of Toms River, County of Ocean	Commerce Bank	\$2,475.00	59040	The Blood Center of New Jersey, Inc.	Marcus Harris
109	MARCUS HARRIS	9/25/06	Township of Toms River, County of Ocean	Commerce Bank	\$2,375.00	59044	The Blood Center of New Jersey, Inc.	Marcus Harris
110	LINDA ROBINSON	10/11/06	City of Bayonne, County of Hudson	PNC Bank	\$493.74	5071213	Allied Barton Security Services	Linda Robinson
111	LINDA ROBINSON	10/12/06	City of Bayonne, County of Hudson	PNC Bank	\$497.38	5071212	Allied Barton Security Services	Linda Robinson
112	LINDA ROBINSON	10/13/06	City of Bayonne, County of Hudson	PNC Bank	\$1,073.56	162993	Bowles Corporate Services, Inc.	Linda Robinson
113	DIANA HUGGINS	10/13/06	City of Clifton, County of Passaic	PNC Bank	\$473.92	162989	Bowles Corporate Services, Inc.	Diana Huggins
114	DIANA HUGGINS	10/13/06	City of Clifton, County of Passaic	PNC Bank	\$489.78	162990	Bowles Corporate Services, Inc.	Diana Huggins
115	DIANA HUGGINS	10/16/06	City of Jersey City, County of Hudson	PNC Bank	\$973.65	163000	Bowles Corporate Services, Inc.	Diana Huggins
116	KELLY MONTES	10/27/06	Borough of Oradell, County of Bergen	Wachovia Bank	\$2,800.00	6225946	Allied Barton Spectaguard Acquisition	Kelly Montes
117	JAVAIRIA JIHAD	10/27/06	Borough of Mount Arlington, County of Morris	Bank of America	\$2,204.35	8178	NJ Democratic State Committee Victory Federal	Javairia Jihad
118	MARCUS HARRIS	10/28/06	Township of Pennsauken, County of Camden	Commerce Bank	\$3,400.64	4677	Kaplow & Co. Insurance	Marcus Harris

Count	Defendant(s)	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
119	TAMIKA SNOWDEN	11/15/06	Township of South Orange, County of Essex	Sovereign Bank	\$977.76	115	PGM & Assoc.	Tamika Snowden
120	TAMIKA SNOWDEN	11/15/06	Township of South Orange, County of Essex	Sovereign Bank	\$986.14	116	PGM & Assoc.	Tamika Snowden
121	JAMIE TATE	11/17/06	Township of Neptune, County of Monmouth	Bank of America	\$4,800.00	18479	New Jersey Turnpike Authority	Jammie Tate
122	JAMIE TATE	11/20/06	Township of Wall, County of Monmouth	Bank of America	\$4,900.00	77944	Dell Marketing, L.P.	Jammie Tate
123	CARLTON E. BROWN	12/6/06	Township of East Hanover, County of Morris	Bank of New York	\$1,484.15	8943	High Mountain Construction, Inc.	Carlton E. Brown

contrary to the provisions of N.J.S.A. 2C:21-1a(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.


AAG Deborah Gramiccioni
Director
Division of Criminal Justice

A TRUE BILL:


Foreperson

Date: 7/7/09

FILED

III 07 2009

SUPERIOR COURT
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ572-09-2(2)

Superior Court

Docket Number 09-07-00127-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

JACINTH BUCHANAN)

MARCUS HARRIS)

AL-KHABIR DIGGS)

KEITH F. CHIPEPO)

CHARLES PALMER)

MATTHEW H. RICHARDS)

SAKINAH A. EURE)

SHERELLE P. BELTON)

MICHELLE HORTON)

LINDA JULES)

GREGORY SALTERS)

JANINA M. BOLDEN-MCCALL)

LINDA ROBINSON)

DIANA HUGGINS)

KELLY MONTES)

JAVAIRIA JIHAD)

TAMIKA SNOWDEN)

JAMIE TATE)

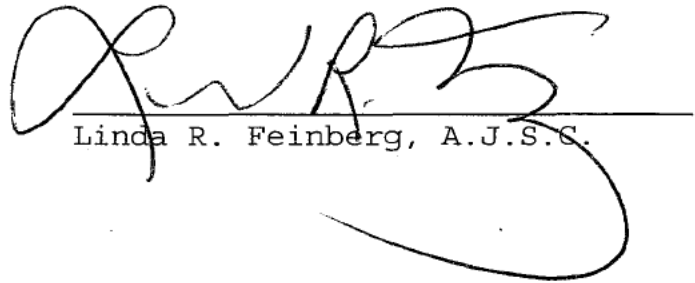
and)

CARLTON E. BROWN)

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 July, 2009, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Monmouth 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 Monmouth for filing.



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