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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ572-09-2(1)

Superior Court

Docket Number 09-06-00123-S

STATE OF NEW JERSEY)

v.)

ERNST FRANCOIS)

also known as)

JR)

ALBENS VICTOR)

also known as)

VIC)

also known as)

JP)

KENNETH ROBERTS)

also known as)

BLACK)

WOODY ARMAND)

ROOSEVELT THELUSMA)

also known as)

BIG)

JEFF DIEURILUS)

also known as)

BIGGIE)

BERTHA CAJUSTE)

QUANISE FREEMAN)

SHAMIRA CHAMPAGNE)

ASHLEY BROWN)

VANESSA BROWN)

and)

RITHA SALUSTE)

INDICTMENT

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

COUNT ONE

(Racketeering - Second Degree)

ERNST FRANCOIS

ALBENS VICTOR

KENNETH ROBERTS

WOODY ARMAND

ROOSEVELT THELUSMA

JEFF DIEURILUS

BERTHA CAJUSTE

QUANISE FREEMAN

SHAMIRA CHAMPAGNE

ASHLEY BROWN

VANESSA BROWN

and

RITHA SALUSTE

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, 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, Carlton 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 forged 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), Issuing Bad Checks (N.J.S.A. 2C:21-5), or conspiracies to commit these crimes, as described herein and in Counts Two through Two Hundred Thirty-Five of this Indictment.

ERNST FRANCOIS

did commit the racketeering conduct by the commission of the crimes of Theft by Deception, Attempted Theft by Deception, Uttering a Forged Instrument, and Issuing a Bad Check, as detailed in Counts Four through Eight, Twelve, Thirteen, Eighteen through Twenty Six, Twenty-Nine, Thirty, Thirty-Six, Forty, Forty-One, Forty-Nine, Fifty-Two, Fifty-Three, Seventy-One through Seventy-Eight, One Hundred Four, One Hundred Five, One Hundred Twenty-Five, One Hundred Twenty-Six, One Hundred Thirty-One, One Hundred Thirty-Two, One Hundred Forty-Two, and One Hundred Forty-Three of this Indictment.

ALBENS VICTOR

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, Forty-Five through Forty-Seven, Fifty through Fifty-Two, Fifty-Four through Sixty, Sixty-Two through Sixty-Five, Sixty-Seven, Sixty-Nine, Seventy, Seventy-Nine, One Hundred Three, One Hundred Six through One Hundred Eighteen, One Hundred Twenty-One through One Hundred Thirty-Two, One Hundred Thirty-Six through One Hundred Forty-One, One Hundred Forty-Seven through One Hundred Fifty-Nine, One Hundred Sixty-One through One Hundred Sixty-Four, One Hundred Seventy, One Hundred Seventy-Five through Two Hundred Two, Two Hundred Four through Two Hundred Twenty-Three, Two

Hundred Twenty-Six, and Two Hundred Twenty-Seven of this Indictment.

KENNETH ROBERTS

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 Three, Forty-Two through Forty-Four, Sixty-One, Eighty through Eighty-Four, Eighty-Six through Eighty-Eight, Ninety-Three through One Hundred Two, One Hundred Thirty-Three through One Hundred Thirty-Five, One Hundred Forty-Four through One Hundred Forty-Six, One Hundred Sixty-Five through One Hundred Sixty-Eight, One Hundred Seventy-One through One Hundred Seventy-Four, and Two Hundred Three of this Indictment.

WOODY ARMAND

did commit the racketeering conduct by the commission of the crimes of Theft by Deception and Uttering a Forged Instrument, as detailed in Counts Nine through Eleven, Thirty-Seven, Thirty-Eight, Eighty-Five, and Eighty-Nine through Ninety-Two of this Indictment.

ROOSEVELT THELUSMA

did commit the racketeering conduct by the commission of the crimes of Theft by Deception, Attempted Theft by Deception, Uttering a Forged Instrument, and Issuing a Bad Check, as detailed in Counts Seventeen, Twenty, Twenty-Two through Twenty-

Six, Thirty-Two, Thirty-Four, Thirty-Five, Forty-Eight, Forty-Nine, Fifty-Three, Sixty-Eight, One Hundred Nineteen, One Hundred Twenty, One Hundred Sixty, One Hundred Sixty-Nine, Two Hundred Twenty-Four, Hundred Twenty-Five, and Two Hundred Twenty-Eight through Two Hundred Thirty-Five of this Indictment.

JEFF DIEURILUS

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-Three, and One Hundred Sixty-Two of this Indictment.

BERTHA CAJUSTE

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 Eighteen, Nineteen, Twenty-One, Fifty-Two, One Hundred Twenty-Five, One Hundred Twenty-Six, One Hundred Thirty-One, and One Hundred Thirty-Two of this Indictment.

QUANISE FREEMAN

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 Four through Eight, Twelve, Thirteen, Twenty, Twenty-Two, Twenty-Three, Thirty-Six, Forty, Forty-One, Forty-Nine, Seventy-One through

Seventy-Eight, One Hundred Four, and One Hundred Five of this Indictment.

SHAMIRA CHAMPAGNE

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, Twenty, Twenty-Two, Twenty-Three, Forty-Nine, One Hundred Four, and One Hundred Five of this Indictment.

ASHLEY 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 Fourteen through Sixteen, Twenty-Seven, Twenty-Eight, Thirty-Nine, Fifty-Five, One Hundred Nine, One Hundred Sixteen through One Hundred Eighteen, One Hundred Thirty-Seven, One Hundred Thirty-Eight, and One Hundred Fifty-Five of this Indictment.

VANESSA BROWN

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 Thirty-One, Sixty, Sixty-Six, Sixty-Seven, One Hundred Fifty-Eight, Two Hundred Two, Two Hundred Twenty-Two, and Two Hundred Twenty-Three of this Indictment.

RITHA SALUSTE

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 Eighteen, Nineteen, Twenty-One, Fifty-Two, Sixty-Nine, One Hundred Twenty-Five, One Hundred Twenty-Six, One Hundred Thirty-One, One Hundred Thirty-Two, and Two Hundred Twenty-Six 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.

COUNT TWO

(Theft by Deception - Second Degree)

ALBENS VICTOR

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, purposely did obtain in excess of \$75,000 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 ALBENS VICTOR well knew, the said checks were not good and not negotiable, all as set forth herein and in Count One of this Indictment:

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
ALBENS VICTOR	3/27/06 to 3/31/06	Township of Scotch Plains, County of Union	Commerce Bank	\$4,860.00 (\$586.77)	9978121	Apex Trust Financial	Natie Gumbs
ALBENS VICTOR	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
ALBENS VICTOR	8/4/06 to 8/7/06	City of Jersey City, County of Hudson	Bank of America	\$4,128.43 (\$100.00)	5114818	Allied Barton	Shaquana Hall
ALBENS VICTOR	8/7/06	Township of Cranford, County of Union	PNC Bank	\$453.12 (\$453.12)	5114820	Allied Barton	Presavia Williams
ALBENS VICTOR	8/7/06	Avenel, Township of Woodbridge, County of Middlesex	PNC Bank	\$498.11 (\$498.11)	5114824	Allied Barton	Ashley Brown

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
ALBENS VICTOR	8/7/06	Avenel, Township of Woodbridge, County of Middlesex	PNC Bank	\$684.13 (\$684.13)	5114826	Allied Barton Spectaguard Acquisition	Charles Palmer
ALBENS VICTOR	8/7/06 to 8/8/06	Borough of Manville, County of Somerset	Bank of America	\$3,761.88 (\$200.00)	5114830	Allied Barton	Shaquana Hall
ALBENS VICTOR	8/7/06 to 8/9/06	Borough of Raritan, County of Somerset	PNC Bank	\$2,613.19 (\$502.00)	5114832	Allied Barton	Sarah Jones
ALBENS VICTOR	8/8/06	City of Jersey City, County of Hudson	PNC Bank	\$412.93 (\$412.93)	5114825	Allied Barton	Ariel Legender
ALBENS VICTOR	8/8/06	City of Newark, County of Essex	Wachovia Bank	\$910.00 (\$910.00)	15657	Corinthian Construction Co., Inc.	Ammie Mitchell
ALBENS VICTOR	8/8/06	City of Jersey City, County of Hudson	PNC Bank	\$783.75 (\$783.75)	5114827	Allied Barton	Ammie Mitchell
ALBENS VICTOR	8/8/06	City of Jersey City, County of Hudson	PNC Bank	\$843.32 (\$843.32)	5114829	Allied Barton	Ashley Brown
ALBENS VICTOR	8/8/06 to 8/14/06	Town of Hackettstown, County of Warren	Valley National Bank	\$2,476.53 (\$2,300.00)	5114839	Allied Barton	Emily Coote
ALBENS VICTOR	8/9/06	Township of Mount Olive, County of Morris	PNC Bank	\$4,481.02 (\$4,481.02)	5114838	Allied Barton	Emily R. Coote
ALBENS VICTOR	8/9/06	Town of Hackettstown, County of Warren	PNC Bank	\$4,254.12 (\$4,254.12)	5114837	Allied Barton	Emily R. Coote
ALBENS VICTOR	8/14/06	Borough of Stanhope, County of Sussex	PNC Bank	\$943.51 (\$943.51)	5114846	Allied Barton	Albens Victor
ALBENS VICTOR	8/14/06	Town of Newton, County of Sussex	PNC Bank	\$917.41 (\$917.41)	5114847	Allied Barton	Bertha B. Cajuste

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
ALBENS VICTOR	8/14/06	Borough of Stanhope, County of Sussex	PNC Bank	\$938.03 (\$938.03)	5114848	Allied Barton	Bertha B. Cajuste
ALBENS VICTOR	8/14/06	Township of Hillsborough, County of Somerset	PNC Bank	\$976.11 (\$976.11)	5114852	Allied Barton	Matthew H. Richards
ALBENS VICTOR	8/14/06	Borough of Raritan, County of Somerset	PNC Bank	\$934.41 (\$934.41)	5114853	Allied Barton	Matthew H. Richards
ALBENS VICTOR	8/15/06	Township of Teaneck, County of Bergen	PNC Bank	\$954.12 (\$954.12)	5114854	Allied Barton	Farah Godard
ALBENS VICTOR	8/30/06 to 8/31/06	Township of Union, County of Union	Bank of America	\$7,800.00 (\$7,800.00)	2804	Park Avenue Talent LTD	Ileola M. Allen
ALBENS VICTOR	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$843.51 (\$843.51)	22382	Motivated Security	Ashley Brown
ALBENS VICTOR	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$856.14 (\$856.14)	22383	Motivated Security	Ashley Brown
ALBENS VICTOR	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$806.29 (\$806.29)	22384	Motivated Security	Charles Palmer
ALBENS VICTOR	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$831.74 (\$831.74)	22385	Motivated Security	Charles Palmer
ALBENS VICTOR	8/31/06 to 9/5/06	City of Jersey City, County of Hudson	Bank of America	\$7,800.00 (\$7,791.29)	2806	Park Avenue Talent LTD	Ileola M. Allen
ALBENS VICTOR	9/12/06	City of Newark, County of Essex	Bank of America	\$7,800.00 (\$480.00)	2824	Park Avenue Talent LTD	Lamont D. Willis
ALBENS VICTOR	9/13/06 to 9/14/06	Township of Montclair, County of Essex	Bank of America	\$8,200.00 (\$7,700.00)	2830	Park Avenue Talent LTD	Lamont D. Willis
ALBENS VICTOR	9/14/06 to 9/15/06	Borough of Bergenfield, County of Bergen	Bank of America	\$8,600.00 (\$8,500.00)	2838	Park Avenue Talent LTD	Kenyetta Banks

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
ALBENS VICTOR	9/15/06 to 9/18/06	City of Jersey City, County of Hudson	Bank of America	\$8,600.00 (\$7,900.00)	168033688	Motivated Security Services	Kenyetta Banks
ALBENS VICTOR	9/18/06	Town of Westfield, County of Union	Commerce Bank	\$5,847.63 (\$5,843.04)	61817	Community Access Unlimited, Inc.	Krystal A. Harte
ALBENS VICTOR	9/18/06	City of Newark, County of Essex	Bank of America	\$7,700.00 (\$100.00)	2848	Park Avenue Talent LTD	Edwin R. Nunev
ALBENS VICTOR	9/18/06 to 9/19/06	City of Jersey City, County of Hudson	Bank of America	\$4,600.00 (\$1,590.00)	3369333699	Motivated Security Services	Kenyetta Banks
ALBENS VICTOR	9/19/06 to 9/20/06	City of Newark, County of Essex	Bank of America	\$8,200.00 (\$8,100.00)	2850	Park Avenue Talent LTD	Edwin R. Nunev
ALBENS VICTOR	9/20/06 to 9/21/06	Township of Union, County of Union	Bank of America	\$8,200.00 (\$6,900.00)	2852	Park Avenue Talent LTD	Bridgett Love
ALBENS VICTOR	9/21/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,976.82 (\$4,976.82)	209743	The Blood Center of New Jersey, Inc.	Vanessa L. Brown
ALBENS VICTOR	9/21/06 to 9/25/06	City of Jersey City, County of Hudson	Bank of America	\$8,600.00 (\$3,400.00)	2854	Park Avenue Talent LTD	Bridgett Love
ALBENS VICTOR	9/22/06 to 9/25/06	City of Newark, County of Essex	Bank of America	\$8,400.00 (\$8,400.00)	295453	Lightolier	Bridgett Love
ALBENS VICTOR	9/24/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,954.72 (\$4,954.72)	209755	The Blood Center of New Jersey, Inc.	Jeff Deiurelus
ALBENS VICTOR	9/24/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,854.67 (\$4,854.67)	209758	The Blood Center of New Jersey, Inc.	Caron A. Romans
ALBENS VICTOR	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

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
ALBENS VICTOR	9/25/06 to 9/26/06	Borough of Garwood, County of Union	Bank of America	\$6,731.19 (\$183.50)	209767	The Blood Center of New Jersey, Inc.	Tyrell Bell
ALBENS VICTOR	9/29/06	Township of Bloomfield, County of Essex	Commerce Bank	\$968.56 (\$968.56)	115412	Georgetowne Group, LP	Desire Robinson
ALBENS VICTOR	10/2/06	City of Rahway, County of Union	Commerce Bank	\$1,081.65 (\$1,081.65)	115425	Georgetowne Group, LP	Peter Sorge
ALBENS VICTOR	10/11/06	City of Bayonne, County of Hudson	PNC Bank	\$493.74 (\$493.74)	5071213	Allied Barton Security Services	Linda Robinson
ALBENS VICTOR	10/12/06	City of Bayonne, County of Hudson	PNC Bank	\$497.38 (\$497.38)	5071212	Allied Barton Security Services	Linda Robinson
ALBENS VICTOR	10/12/06	Township of Bloomfield, County of Essex	PNC Bank	\$1,071.54 (\$1,071.54)	162982	Bowles Corporate Services, Inc.	Charles M. Tyler
ALBENS VICTOR	10/12/06	Township of Montclair, County of Essex	Bank of America	\$7,900.00 (\$100.00)	232759	Wells Fargo Financial	David F. Coleman, Jr.
ALBENS VICTOR	10/13/06	Township of Edison, County of Middlesex	PNC Bank	\$489.72 (\$489.72)	5071219	Allied Barton Security Services	Peter Sorge
ALBENS VICTOR	10/13/06	City of Bayonne, County of Hudson	PNC Bank	\$1,073.56 (\$1,073.56)	162993	Bowles Corporate Services, Inc.	Linda Robinson
ALBENS VICTOR	10/13/06	City of Clifton, County of Passaic	PNC Bank	\$473.92 (\$473.92)	162989	Bowles Corporate Services, Inc.	Diana Huggins
ALBENS VICTOR	10/13/06	City of Clifton, County of Passaic	PNC Bank	\$489.78 (\$489.78)	162990	Bowles Corporate Services, Inc.	Diana Huggins
ALBENS VICTOR	10/13/06	Township of Montclair, County of Essex	Bank of America	\$8,800.00 (\$7,700.00)	232790	Wells Fargo Financial	David F. Coleman, Jr.
ALBENS VICTOR	10/16/06	Township of North Brunswick, County of Middlesex	PNC Bank	\$496.75 (\$496.75)	5071218	Allied Barton Security Services	Peter Sorge

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
ALBENS VICTOR	10/16/06	City of Jersey City, County of Hudson	PNC Bank	\$973.65 (\$973.65)	163000	Bowles Corporate Services, Inc.	Diana Huggins
ALBENS VICTOR	10/16/06	City of Bayonne, County of Hudson	PNC Bank	\$1,086.34 (\$1,086.34)	163006	Bowles Corporate Services, Inc.	Desire Robinson
ALBENS VICTOR	10/16/06	Borough of Glen Ridge, County of Essex	Bank of America	\$8,300.00 (\$6,128.00)	295496	Lightolier	David F. Coleman, Jr.
ALBENS VICTOR	10/18/06	Township of South Brunswick, County of Middlesex	Bank of America	\$9,200.00 (\$2,100.00)	7168	Automated Management	David F. Coleman, Jr.
ALBENS VICTOR	10/18/06 to 10/19/06	Borough of Glen Ridge, County of Essex	Bank of America	\$8,600.00 (\$8,600.00)	295499	Lightolier	David F. Coleman, Jr.
ALBENS VICTOR	10/20/06	Township of Ewing, County of Mercer	Bank of America	\$7,210.00 (\$101.90)	18456	New Jersey Turnpike Authority	Stephane A. Celestin
ALBENS VICTOR	10/23/06 to 10/24/06	Township of Montclair, County of Essex	Bank of America	\$7,950.00 (\$7,600.00)	18457	New Jersey Turnpike Authority	Shonda N. Sterling
ALBENS VICTOR	10/25/06	Township of Pennsauken, County of Camden	Bank of America	\$4,900.00 (\$140.00)	798605	The Leukemia & Lymphoma Society	Doretha L. Powell
ALBENS VICTOR	10/25/06	Borough of Bergenfield, County of Bergen	Bank of America	\$7,800.00 (\$500.00)	6225943	Allied Barton Spectaguard Acuisition	Adeyinka Oyenuga
ALBENS VICTOR	10/25/06 to 10/26/06	Borough of Dumont, County of Bergen	Bank of America	\$7,600.00 (\$7,333.90)	6225940	Allied Barton Spectaguard Acuisition	Shatoyia Johnson
ALBENS VICTOR	10/26/06	Township of Mount Laurel, County of Burlington	Bank of America	\$4,900.00 (\$700.00)	18461	New Jersey Turnpike Authority	Doretha L. Powell
ALBENS VICTOR	10/30/06	Township of Washington, County of Gloucester	Bank of America	\$5,700.00 (\$140.00)	4180934	CDG Management, LLC	Tamena S. Evans

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
ALBENS VICTOR	10/30/06 to 10/31/06	Borough of Paramus, County of Bergen	Bank of America	\$8,300.00 (\$8,280.00)	232819	Wells Fargo Financial	D.G.
ALBENS VICTOR	10/30/06 to 10/31/06	Borough of Laurel Springs, County of Camden	Bank of America	\$5,800.00 (\$4,550.00)	798617	The Leukemia & Lymphoma Society	Tamena S. Evans
ALBENS VICTOR	10/31/06	Borough of Paramus, County of Bergen	Bank of America	\$8,540.00 (\$3,500.00)	18467	New Jersey Turnpike Authority	D.G.
ALBENS VICTOR	10/31/06	Township of Mount Holly, County of Burlington	Bank of America	\$9,500.00 (\$1,000.00)	612360	Guardsman Products Business Unit	Tamena S. Evans
ALBENS VICTOR	11/1/06	City of Newark, County of Essex	Bank of America	\$7,500.00 (\$700.00)	295508	Lightolier	D.G.
ALBENS VICTOR	11/8/06	Borough of Roselle, County of Union	Bank of America	\$7,800.00 (\$160.00)	18475	New Jersey Turnpike Authority	Jessica Maurice
ALBENS VICTOR	11/8/06 to 11/9/06	City of Bordentown, County of Burlington	Bank of America	\$9,500.00 (\$5,502.00)	253736	Wachovia Bank Cashier's Check	Kathleen R. Hughes
ALBENS VICTOR	11/15/06	Township of South Orange, County of Essex	Sovereign Bank	\$986.14 (\$986.14)	116	PGM & Assoc	Tamika Snowden
ALBENS VICTOR	11/17/06	Township of Neptune, County of Monmouth	Bank of America	\$4,800.00 (\$20.00)	18479	New Jersey Turnpike Authority	Jammie Tate
ALBENS VICTOR	11/20/06	Township of Cherry Hill, County of Camden	Bank of America	\$4,900.00 (\$480.00)	295514	Lightolier	Emilio Thorpe
ALBENS VICTOR	11/20/06 to 11/21/06	Marlton, Township of Evesham, County of Burlington	Bank of America	\$4,800.00 (\$82.50)	18480	New Jersey Turnpike Authority	Emilio Thorpe
ALBENS VICTOR	11/20/06 to 11/22/06	Township of Wall, County of Monmouth	Bank of America	\$4,900.00 (\$60.00)	77944	Dell Marketing, L.P.	Jammie Tate

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
ALBENS VICTOR	11/21/06 to 11/22/06	Township of Wall, County of Monmouth	Bank of America	\$4,900.00 (\$500.00)	612369	Guardsman Products Business Unit	Duane Homes
ALBENS VICTOR	11/24/06	Borough of Cresskill, County of Bergen	PNC Bank	\$2,463.72 (\$160.00)	52350	Local 1233 Federal Credit Union	Vanessa L. Brown

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

COUNT THREE

(Theft by Deception - Second Degree)

KENNETH ROBERTS

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, purposely did obtain in excess of \$75,000 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 KENNETH ROBERTS well knew, the said checks were not good and not negotiable, all as set forth herein and in Count One of this Indictment:

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
KENNETH ROBERTS	5/22/06	Borough of Runnemedede, County of Camden	Commerce Bank	\$3,269.32 (\$3,269.32)	1244	PMK Services, LLC	Marcus Harris
KENNETH ROBERTS	5/22/06	Township of Washington, County of Gloucester	Commerce Bank	\$3,269.32 (\$3,269.32)	1246	PMK Services, LLC	Marcus Harris
KENNETH ROBERTS	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
KENNETH ROBERTS	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
KENNETH ROBERTS	6/8/06 to 6/12/06	Township of Montclair, County of Essex	Bank of America	\$6,200.00 (\$5,042.86)	48718	Surety Title Agency of Atlantic County	Gregory Vincent Knight
KENNETH ROBERTS	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

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
KENNETH ROBERTS	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
KENNETH ROBERTS	7/3/06	Township of Wall, County of Monmouth	Commerce Bank	\$2,800.00 (\$2,800.00)	8195	Township of Cranford	Marcus Harris
KENNETH ROBERTS	7/7/06	Borough of Somerville, County of Somerset	Bank of America	\$4,600.00 (\$300.00)	8197	Township of Cranford	Cherise S. Rickenbacker
KENNETH ROBERTS	7/10/06	Township of Warren, County of Somerset	Bank of America	\$4,900.50 (\$100.00)	2710	General Financial Services, Inc.	Alicia S. Attzs
KENNETH ROBERTS	7/10/06 to 7/11/06	Township of Bridgewater, County of Somerset	Bank of America	\$4,900.50 (\$4,900.50)	2714	General Financial Services, Inc.	Cherise S. Rickenbacker
KENNETH ROBERTS	7/11/06 to 7/12/06	Township of Scotch Plains, County of Union	Bank of America	\$9,200.00 (\$9,200.00)	1225004	Lumineers Co.	Alicia S. Attzs
KENNETH ROBERTS	7/11/06 to 7/12/06	Gillette, Township of Long Hill, County of Morris	Bank of America	\$9,000.00 (\$4,520.00)	8143	Township of Cranford	Alicia S. Attzs
KENNETH ROBERTS	7/12/06 to 7/13/06	Township of Union, County of Union	JP Morgan Chase Bank	\$3,700.00 (\$100.00)	1225003	Lumineers Co.	Sabrina A. Saleim
KENNETH ROBERTS	7/12/06 to 7/13/06	Township of Union, County of Union	JP Morgan Chase Bank	\$3,700.00 (\$100.00)	8141	Township of Cranford	Sabrina A. Saleim
KENNETH ROBERTS	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
KENNETH ROBERTS	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
KENNETH ROBERTS	8/28/06	Township of Willingboro, County of Burlington	Commerce Bank	\$2,200.00 (\$2,200.00)	42500	Demarite Industries, LLC	Marcus Harris

Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
KENNETH ROBERTS	9/11/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,406.54 (\$2,406.54)	7082	Ken Smith Lincoln Mercury	Marcus Harris
KENNETH ROBERTS	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
KENNETH ROBERTS	9/11/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,200.00 (\$2,200.00)	7088	Ken Smith Lincoln Mercury	Marcus Harris
KENNETH ROBERTS	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
KENNETH ROBERTS	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
KENNETH ROBERTS	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
KENNETH ROBERTS	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
KENNETH ROBERTS	9/26/06	Town of Morristown, County of Morris	Bank of America	\$5,475.00 (\$120.00)	59085	The Blood Center of New Jersey, Inc.	Sherry Williams
KENNETH ROBERTS	9/27/06	Township of Berkeley Heights, County of Union	Commerce Bank	\$5,375.00 (\$100.00)	59057	The Blood Center of New Jersey, Inc.	Godje Abasse
KENNETH ROBERTS	9/27/06 to 9/28/06	Borough of Madison, County of Morris	Bank of America	\$5,475.00 (\$5,308.00)	59105	The Blood Center of New Jersey, Inc.	Sherry Williams
KENNETH ROBERTS	9/27/06 to 9/28/06	Gillette, Township of Long Hill, County of Morris	Commerce Bank	\$5,575.00 (\$82.00)	59067	The Blood Center of New Jersey, Inc.	Godje Abasse

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

COUNTS FOUR THROUGH THIRTY-FIVE

(Theft by Deception - Third Degree)

ERNST FRANCOIS

WOODY ARMAND

ROOSEVELT THELUSMA

JEFF DIEURILUS

BERTHA CAJUSTE

QUANISE FREEMAN

SHAMIRA CHAMPAGNE

ASHLEY BROWN

VANESSA BROWN

and

RITHA SALUSTE

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 ERNST FRANCOIS, WOODY ARMAND, ROOSEVELT THELUSMA, JEFF DIEURILUS, BERTHA CAJUSTE, QUANISE FREEMAN, SHAMIRA CHAMPAGNE, ASHLEY BROWN, VANESSA BROWN, and RITHA SALUSTE well knew, the said checks were not good and not negotiable, all as set forth herein and in Count One of this Indictment:

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
4	ERNST FRANCOIS, QUANISE FREEMAN	6/20/05	Borough of Bergenfield, County of Bergen	PNC Bank	\$4,100.00 (\$501.50)	1006	Irvington Ocean Realty, LLC	Quanise Freeman
5	ERNST FRANCOIS, QUANISE FREEMAN	12/12/05	Township of Secaucus, County of Hudson	Bank of America	\$4,885.92 (\$4,885.92)	223	C.C.	Jacinth Buchanan
6	ERNST FRANCOIS, QUANISE FREEMAN	12/12/05	Township of Harrison, County of Hudson	Bank of America	\$4,885.92 (\$4,885.92)	224	C.C.	Jacinth Buchanan
7	ERNST FRANCOIS, QUANISE FREEMAN	12/13/05 to 12/14/05	Township of Springfield, County of Union	Bank of America	\$4,250.00 (\$760.00)	750	S.C.	Jacinth Buchanan
8	ERNST FRANCOIS, QUANISE FREEMAN	12/14/05	Borough of Madison, County of Morris	Bank of America	\$2,500.00 (\$2,500.00)	127	Jacinth Buchanan	Jacinth Buchanan
9	WOODY ARMAND	6/6/06 to 6/7/06	Township of Union, County of Union	Commerce Bank	\$6,500.60 (\$501.75)	402	Quaker Ridge Shopping Center	Sherley Celian
10	WOODY ARMAND	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
11	WOODY ARMAND	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
12	ERNST FRANCOIS, QUANISE FREEMAN, SHAMIRA CHAMPAGNE	7/20/06 to 7/28/06	Township of Old Bridge, County of Middlesex	Commerce Bank	\$2,900.00 (\$1,380.00)	1187	Anthony C. Russell Jr.	Shamira J. Champagne
13	ERNST FRANCOIS, QUANISE FREEMAN, SHAMIRA CHAMPAGNE	7/20/06 to 7/28/06	Borough of Freehold, County of Monmouth	Commerce Bank	\$2,900.00 (\$1,500.00)	1188	Anthony C. Russell Jr.	Shamira J. Champagne
14	ASHLEY BROWN	8/8/06	City of Jersey City, County of Hudson	PNC Bank	\$783.75 (\$783.75)	5114827	Allied Barton	Ammie Mitchell

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
15	ASHLEY BROWN	8/8/06	City of Newark, County of Essex	Wachovia Bank	\$910.00 (\$910.00)	15657	Corinthian Construction, Inc.	Ammie Mitchell
16	ASHLEY BROWN	8/8/06	City of Jersey City, County of Hudson	PNC Bank	\$843.32 (\$843.32)	5114829	Allied Barton	Ashley Brown
17	ROOSEVELT THELUSMA	8/8/06 to 8/10/06	Township of Cherry Hill, County of Camden	Commerce Bank	\$3,560.00 (\$502.00)	1165	Ludwig Crandon DBA Torin Construction	Roosevelt Thelusma
18	ERNST FRANCOIS, RITHA SALUSTE, BERTHA CAJUSTE	8/14/06	Town of Newton, County of Sussex	PNC Bank	\$917.41 (\$917.41)	5114847	Allied Barton	Bertha B. Cajuste
19	ERNST FRANCOIS, RITHA SALUSTE, BERTHA CAJUSTE	8/14/06	Borough of Stanhope, County of Sussex	PNC Bank	\$938.03 (\$938.03)	5114848	Allied Barton	Bertha B. Cajuste
20	ERNST FRANCOIS, ROOSEVELT THELUSMA, QUANISE FREEMAN, SHAMIRA CHAMPAGNE	8/14/06 to 8/17/06	Borough of Red Bank, County of Monmouth	Bank of America	\$3,380.00 (\$3,200.00)	226	Roosevelt Thelusma	Sherelle P. Belton
21	ERNST FRANCOIS, RITHA SALUSTE, BERTHA CAJUSTE	8/15/06	Township of Teaneck, County of Bergen	PNC Bank	\$954.12 (\$954.12)	5114854	Allied Barton	Farah Godard
22	ERNST FRANCOIS, ROOSEVELT THELUSMA, QUANISE FREEMAN, SHAMIRA CHAMPAGNE	8/17/06 to 8/18/06	Township of Holmdel, County of Monmouth	Bank of America	\$4,250.00 (\$700.00)	125	Roosevelt Thelusma	Michelle Horton

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
23	ERNST FRANCOIS, ROOSEVELT THELUSMA, QUANISE FREEMAN, SHAMIRA CHAMPAGNE	8/17/06 to 8/21/06	Township of Middletown, County of Monmouth	Bank of America	\$3,000.00 (\$3,000.00)	124	Roosevelt Thelusma	Michelle Horton
24	ERNST FRANCOIS, ROOSEVELT THELUSMA	8/21/06 to 8/23/06	Township of Lakewood, County of Ocean	Wachovia Bank	\$2,830.00 (\$2,830.00)	117	Roosevelt Thelusma	Linda Jules
25	ERNST FRANCOIS, ROOSEVELT THELUSMA	8/21/06 to 8/23/06	Township of Howell, County of Monmouth	Wachovia Bank	\$2,000.00 (\$601.30)	124	Roosevelt Thelusma	Linda Jules
26	ERNST FRANCOIS, ROOSEVELT THELUSMA	8/22/06	Township of Manalapan, County of Monmouth	Wachovia Bank	\$2,000.00 (\$2,000.00)	241	Roosevelt Thelusma	Linda Jules
27	ASHLEY BROWN	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$843.51 (\$843.51)	22382	Motivated Security	Ashley Brown
28	ASHLEY BROWN	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$856.14 (\$856.14)	22383	Motivated Security	Ashley Brown
29	ERNST FRANCOIS	9/1/06 to 9/7/06	Township of Middletown, County of Monmouth	Commerce Bank	\$2,000.00 (\$2,000.00)	1005	Yadmine Compere	Linda Jules
30	ERNST FRANCOIS	9/1/06 to 9/8/06	Township of Hazlet, County of Monmouth	Commerce Bank	\$2,000.00 (\$502.00)	1007	Yadmine Compere	Linda Jules
31	VANESSA BROWN	9/21/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,976.82 (\$4,976.82)	209743	The Blood Center of New Jersey, Inc.	Vanessa L. Brown
32	ROOSEVELT THELUSMA	9/22/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,907.11 (\$4,907.11)	209744	The Blood Center of New Jersey, Inc.	Roosevelt Thelusma

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
33	JEFF DIEURILUS	9/24/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,954.72 (\$4,954.72)	209755	The Blood Center of New Jersey, Inc.	Jeff Dieurilus
34	ROOSEVELT THELUSMA	9/25/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,923.13 (\$4,923.13)	209756	The Blood Center of New Jersey, Inc.	Roosevelt Thelusma
35	ROOSEVELT THELUSMA	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 THIRTY-SIX THROUGH THIRTY-NINE

(Theft by Deception - Fourth Degree)

ERNST FRANCOIS

QUANISE FREEMAN

WOODY ARMAND

and

ASHLEY BROWN

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, purposely did obtain at least \$200 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 ERNST FRANCOIS, QUANISE FREEMAN, WOODY ARMAND, and ASHLEY 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	Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
36	ERNST FRANCOIS, QUANISE FREEMAN	6/20/05 to 6/22/05	City of Hackensack, County of Bergen	PNC Bank	\$4,300.00 (\$200.00)	1008	Irvington Ocean Realty, LLC	Quanise Freeman
37	WOODY ARMAND	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
38	WOODY ARMAND	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

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount (Theft Amount)	Check #	Account	Payee
39	ASHLEY BROWN	8/7/06	Avenel, Township of Woodbridge, County of Middlesex	PNC Bank	\$498.11 (\$498.11)	5114824	Allied Barton	Ashley 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 THROUGH SEVENTY

(Attempted Theft by Deception - Third Degree)

ERNST FRANCOIS

ALBENS VICTOR

KENNETH ROBERTS

ROOSEVELT THELUSMA

BERTHA CAJUSTE

QUANISE FREEMAN

SHAMIRA CHAMPAGNE

ASHLEY BROWN

VANESSA BROWN

and

RITHA SALUSTE

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 ERNST FRANCOIS, ALBENS VICTOR, KENNETH ROBERTS, ROOSEVELT THELUSMA, BERTHA CAJUSTE, QUANISE FREEMAN, SHAMIRA CHAMPAGNE, ASHLEY BROWN, VANESSA BROWN, and RITHA SALUSTE well knew, the said checks were not good and not negotiable, all as set forth herein, and in Count One of this Indictment:

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
40	ERNST FRANCOIS, QUANISE FREEMAN	12/14/05	Township of Morristown, County of Morris	Bank of America	\$4,875.00	166	Angelo Felix	Jacinth Buchanan
41	ERNST FRANCOIS, QUANISE FREEMAN	12/14/05	Township of Irvington, County of Essex	Bank of America	\$2,813.00	167	Angelo Felix	Jacinth Buchanan
42	KENNETH ROBERTS	5/24/06	Borough of Roseland, County of Essex	Bank of America	\$3,369.87	101162	Handler Manuf. Co.	Elliott Berrian
43	KENNETH ROBERTS	7/10/06	Borough of Watchung, County of Somerset	Bank of America	\$4,500.50	1620	Dixie Real Estate	Alicia Attsz
44	KENNETH ROBERTS	7/11/06	Town of Westfield, County of Union	Valley National Bank	\$2,500.00	8142	Township of Cranford	A.C.
45	ALBENS VICTOR	8/4/06	City of Jersey City, County of Hudson	Bank of America	\$4,473.11	5114819	Allied Barton	Shaquana Hall
46	ALBENS VICTOR	8/7/06	Town of Dover, County of Morris	Bank of America	\$3,200.65	5114831	Allied Barton	Shaquana Hall
47	ALBENS VICTOR	8/7/06	Township of Bridgewater, County of Somerset	PNC Bank	\$2,200.76	5114833	Allied Barton	Sarah Jones
48	ROOSEVELT THELUSMA	8/8/06	Borough of Englishtown, County of Monmouth	Commerce Bank	\$4,000.00	1162	Ludwig Crandon DBA Torin Construction	Roosevelt Thelusma
49	ERNST FRANCOIS, ROOSEVELT THELUSMA, QUANISE FREEMAN, SHAMIRA CHAMPAGNE	8/14/06	Township of Middletown, County of Monmouth	Bank of America	\$3,380.00	225	Roosevelt Thelusma	Sherelle P. Belton
50	ALBENS VICTOR	8/14/06	Township of Piscataway, County of Middlesex	Commerce Bank	\$4,500.00	395	Camilla Mishoe	Sakinah A. Eure

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
51	ALBENS VICTOR	8/14/06	Stirling, Township of Long Hill, County of Morris	PNC Bank	\$984.16	5114849	Allied Barton	Sakinah A. Eure
52	ERNST FRANCOIS, ALBENS VICTOR, RITHA SALUSTE, BERTHA CAJUSTE	8/15/06	Borough of Palisades Park, County of Bergen	PNC Bank	\$937.86	5114855	Allied Barton	Farah Godard
53	ERNST FRANCOIS, ROOSEVELT THELUSMA	8/21/06	Township of Toms River, County of Ocean	Wachovia Bank	\$2,000.00	110	Roosevelt Thelusma	Linda Jules
54	ALBENS VICTOR	9/15/06	Township of Cranford, County of Union	Commerce Bank	\$5,200.00	295450	Lightolier	Krystal A. Harte
55	ALBENS VICTOR, ASHLEY BROWN	9/19/06	Township of South Orange, County of Essex	PNC Bank	\$523.64	3369333703	Motivated Security Services	Gregory Salters
56	ALBENS VICTOR	10/25/06	Township of Montclair, County of Essex	Bank of America	\$8,750.00	295503	Lightolier	Shonda N. Sterling
57	ALBENS VICTOR	10/25/06	City of Beverly, County of Burlington	Bank of America	\$5,800.00	77936	Dell Marketing L.P.	Doretha L. Powell
58	ALBENS VICTOR	10/26/06	Marlton, Township of Evesham, County of Burlington	Bank of America	\$4,975.00	295504	Lightolier	Doretha L. Powell
59	ALBENS VICTOR	10/27/06	Borough of Oradell, County of Bergen	Wachovia Bank	\$2,800.00	6225946	Allied Barton Spectaguard Acuisition	Kelly Montes
60	ALBENS VICTOR, VANESSA BROWN	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

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
61	KENNETH ROBERTS	10/28/06	Township of Pennsauken, County of Camden	Commerce Bank	\$3,400.64	4677	Kaplow & Co. Insurance	Marcus Harris
62	ALBENS VICTOR	10/31/06	Township of Mount Holly, County of Burlington	Bank of America	\$4,500.00	18465	New Jersey Turnpike Authority	Tamena S. Evans
63	ALBENS VICTOR	11/2/06	Township of Union, County of Union	Commerce Bank	\$7,500.00	18472	New Jersey Turnpike Authority	Shanae J. Knight
64	ALBENS VICTOR	11/07/06	Township of Voorhees, County of Camden	Bank of America	\$8,500.00	18473	New Jersey Turnpike Authority	Kathleen R. Hughes
65	ALBENS VICTOR	11/15/06	Township of South Orange, County of Essex	Sovereign Bank	\$977.76	115	PGM & Assoc.	Tamika Snowden
66	VANESSA BROWN	11/24/06	Borough of Cresskill, County of Bergen	PNC Bank	\$2,463.72	52350	Local 1233 Federal Credit Union	Vanessa L. Brown
67	ALBENS VICTOR, VANESSA BROWN	11/24/06	Borough of Tenefly, County of Bergen	PNC Bank	\$2,265.71	52351	Local 1233 Federal Credit Union	Vanessa L. Brown
68	ROOSEVELT THELUSMA	12/7/06	Township of Millburn, County of Essex	Bank of New York	\$2,463.41	8947	High Mountain Construction, Inc.	Roosevelt Thelusma
69	ALBENS VICTOR, RITHA SALUSTE	1/29/07	Township of South Orange, County of Essex	Bank of America	\$979.14	112301	Pilgrim Insurance Company	Ritha Saluste
70	ALBENS VICTOR	3/21/07	Township of Fairfield, County of Essex	Commerce Bank	\$954.11	1543091	The Proformance Insurance Co.	Albels Victor

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 SEVENTY-ONE THROUGH TWO HUNDRED TWENTY-SEVEN

(Uttering a Forged Instrument - Third Degree)

ERNST FRANCOIS

ALBENS VICTOR

KENNETH ROBERTS

WOODY ARMAND

ROOSEVELT THELUSMA

JEFF DIEURILUS

BERTHA CAJUSTE

QUANISE FREEMAN

SHAMIRA CHAMPAGNE

ASHLEY BROWN

VANESSA BROWN

and

RITHA SALUSTE

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	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
71	ERNST FRANCOIS, QUANISE FREEMAN	6/20/05	Borough of Bergenfield, County of Bergen	PNC Bank	\$4,100.00	1006	Irvington Ocean Realty, LLC	Quanise Freeman
72	ERNST FRANCOIS, QUANISE FREEMAN	6/20/05	City of Hackensack, County of Bergen	PNC Bank	\$4,300.00	1008	Irvington Ocean Realty, LLC	Quanise Freeman
73	ERNST FRANCOIS, QUANISE FREEMAN	12/12/05	Township of Secaucus, County of Hudson	Bank of America	\$4,885.92	223	C.C.	Jacinth Buchanan
74	ERNST FRANCOIS, QUANISE FREEMAN	12/12/05	Township of Harrison, County of Hudson	Bank of America	\$4,885.92	224	C.C.	Jacinth Buchanan
75	ERNST FRANCOIS, QUANISE FREEMAN	12/13/05	Township of Springfield, County of Union	Bank of America	\$4,250.00	750	S.C.	Jacinth Buchanan
76	ERNST FRANCOIS, QUANISE FREEMAN	12/14/05	Township of Morristown, County of Morris	Bank of America	\$4,875.00	166	Angelo Felix	Jacinth Buchanan
77	ERNST FRANCOIS, QUANISE FREEMAN	12/14/05	Borough of Madison, County of Morris	Bank of America	\$2,500.00	127	Jacinth Buchanan	Jacinth Buchanan
78	ERNST FRANCOIS, QUANISE FREEMAN	12/14/05	Township of Irvington, County of Essex	Bank of America	\$2,813.00	167	Angelo Felix	Jacinth Buchanan
79	ALBENS VICTOR	3/27/06	Township of Scotch Plains, County of Union	Commerce Bank	\$4,860.00	9978121	Apex Trust Financial	Natalie Gumbs
80	KENNETH ROBERTS	5/22/06	Borough of Runnemede, County of Camden	Commerce Bank	\$3,269.32	1244	PMK Services, LLC	Marcus Harris
81	KENNETH ROBERTS	5/22/06	Township of Washington, County of Gloucester	Commerce Bank	\$3,269.32	1246	PMK Services, LLC	Marcus Harris

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
82	KENNETH ROBERTS	5/24/06	Borough of Roseland, County of Essex	Bank of America	\$3,369.87	101162	Handler Manuf. Co.	Elliott Berrian
83	KENNETH ROBERTS	6/3/06	Township of Cherry Hill, County of Camden	Commerce Bank	\$3,485.75	48714	Surety Title Agency of Atlantic County	Marcus Harris
84	KENNETH ROBERTS	6/3/06	Township of Mount Laurel, County of Burlington	Commerce Bank	\$3,485.75	48717	Surety Title Agency of Atlantic County	Marcus Harris
85	WOODY ARMAND	6/6/06	Township of Union, County of Union	Commerce Bank	\$6,500.60	402	Quaker Ridge Shopping Center	Sherley Celian
86	KENNETH ROBERTS	6/8/06	Township of Montclair, County of Essex	Bank of America	\$6,200.00	48718	Surety Title Agency of Atlantic County	Gregory Vincent Knight
87	KENNETH ROBERTS	6/9/06	Township of Marlboro, County of Monmouth	Commerce Bank	\$3,197.95	48718	Surety Title Agency of Atlantic County	Marcus Harris
88	KENNETH ROBERTS	6/11/06	Borough of Eatontown, County of Monmouth	Commerce Bank	\$3,197.95	48723	Surety Title Agency of Atlantic County	Marcus Harris
89	WOODY ARMAND	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
90	WOODY ARMAND	6/28/06	City of Newark, County of Essex	Bank of America	\$750.00	100077362	The Valley Hospital Valley Health System	Al-Khabir Diggs
91	WOODY ARMAND	6/28/06	Township of Irvington, County of Essex	Bank of America	\$489.87	100077379	The Valley Hospital Valley Health System	Al-Khabir Diggs
92	WOODY ARMAND	6/28/06	City of Newark, County of Essex	Bank of America	\$789.67	100077384	The Valley Hospital Valley Health System	Al-Khabir Diggs
93	KENNETH ROBERTS	7/3/06	Township of Wall, County of Monmouth	Commerce Bank	\$2,800.00	8195	Township of Cranford	Marcus Harris

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
94	KENNETH ROBERTS	7/7/06	Borough of Somerville, County of Somerset	Bank of America	\$4,600.00	8197	Township of Cranford	Cherise S. Rickenbacker
95	KENNETH ROBERTS	7/10/06	Township of Warren, County of Somerset	Bank of America	\$4,900.50	2710	General Financial Services, Inc.	Alicia S. Attz
96	KENNETH ROBERTS	7/10/06	Borough of Watchung, County of Somerset	Bank of America	\$4,500.50	1620	Dixie Real Estate	Alicia Attz
97	KENNETH ROBERTS	7/10/06	Township of Bridgewater, County of Somerset	Bank of America	\$4,900.50	2714	General Financial Services, Inc.	Cherise S. Rickenbacker
98	KENNETH ROBERTS	7/11/06	Town of Westfield, County of Union	Valley National Bank	\$2,500.00	8142	Township of Cranford	A.C.
99	KENNETH ROBERTS	7/11/06	Township of Scotch Plains, County of Union	Bank of America	\$9,200.00	1225004	Lumineers Co.	Alicia S. Attz
100	KENNETH ROBERTS	7/11/06	Gillette, Township of Long Hill, County of Morris	Bank of America	\$9,000.00	8143	Township of Cranford	Alicia S. Attz
101	KENNETH ROBERTS	7/12/06	Township of Union, County of Union	JP Morgan Chase Bank	\$3,700.00	1225003	Lumineers Co.	Sabrirah A. Saleim
102	KENNETH ROBERTS	7/12/06	Township of Union, County of Union	JP Morgan Chase Bank	\$3,700.00	8141	Township of Cranford	Sabrina A. Saleim
103	ALBENS VICTOR	7/18/06	Borough of Oradell, County of Bergen	Bank of America	\$6,200.00	2752	Park Avenue Talent LTD	Keith F. Chipepo
104	ERNST FRANCOIS, QUANISE FREEMAN, SHAMIRA CHAMPAGNE	7/20/06	Township of Old Bridge, County of Middlesex	Commerce Bank	\$2,900.00	1187	Anthony C. Russell Jr.	Shamira J. Champagne

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
105	ERNST FRANCOIS, QUANISE FREEMAN, SHAMIRA CHAMPAGNE	7/20/06	Borough of Freehold, County of Monmouth	Commerce Bank	\$2,900.00	1188	Anthony C. Russell Jr.	Shamira J. Champagne
106	ALBENS VICTOR	8/4/06	City of Jersey City, County of Hudson	Bank of America	\$4,128.43	5114818	Allied Barton	Shaquana Hall
107	ALBENS VICTOR	8/4/06	City of Jersey City, County of Hudson	Bank of America	\$4,473.11	5114819	Allied Barton	Shaquana Hall
108	ALBENS VICTOR	8/7/06	Township of Cranford, County of Union	PNC Bank	\$453.12	5114820	Allied Barton	Presavia Williams
109	ALBENS VICTOR, ASHLEY BROWN	8/7/06	Avenel, Township of Woodbridge, County of Middlesex	PNC Bank	\$498.11	5114824	Allied Barton	Ashley Brown
110	ALBENS VICTOR	8/7/06	Avenel, Township of Woodbridge, County of Middlesex	PNC Bank	\$684.13	5114826	Allied Barton Spectaguard Acquisition	Charles Palmer
111	ALBENS VICTOR	8/7/06	Town of Dover, County of Morris	Bank of America	\$3,200.65	5114831	Allied Barton	Shaquana Hall
112	ALBENS VICTOR	8/7/06	Township of Bridgewater, County of Somerset	PNC Bank	\$2,200.76	5114833	Allied Barton	Sarah Jones
113	ALBENS VICTOR	8/7/06	Borough of Manville, County of Somerset	Bank of America	\$3,761.88	5114830	Allied Barton	Shaquana Hall
114	ALBENS VICTOR	8/7/06	Borough of Raritan, County of Somerset	PNC Bank	\$2,613.19	5114832	Allied Barton	Sarah Jones
115	ALBENS VICTOR	8/8/06	City of Jersey City, County of Hudson	PNC Bank	\$412.93	5114825	Allied Barton	Ariel Legender

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
116	ALBENS VICTOR, ASHLEY BROWN	8/8/06	City of Newark, County of Essex	Wachovia Bank	\$910.00	15657	Corinthian Construction, Inc.	Ammie Mitchell
117	ALBENS VICTOR, ASHLEY BROWN	8/8/06	City of Jersey City, County of Hudson	PNC Bank	\$783.75	5114827	Allied Barton	Ammie Mitchell
118	ALBENS VICTOR, ASHLEY BROWN	8/8/06	City of Jersey City, County of Hudson	PNC Bank	\$843.32	5114829	Allied Barton	Ashley Brown
119	ROOSEVELT THELUSMA	8/8/06	Borough of Englishtown, County of Monmouth	Commerce Bank	\$4,000.00	1162	Ludwig Crandon DBA Torin Construction	Roosevelt Thelusma
120	ROOSEVELT THELUSMA	8/8/06	Township of Cherry Hill, County of Camden	Commerce Bank	\$3,560.00	1165	Ludwig Crandon DBA Torin Construction	Roosevelt Thelusma
121	ALBENS VICTOR	8/8/06	Town of Hackettstown, County of Warren	Valley National Bank	\$2,476.53	5114839	Allied Barton	Emily Coote
122	ALBENS VICTOR	8/9/06	Township of Mount Olive, County of Morris	PNC Bank	\$4,481.02	5114838	Allied Barton	Emily R. Coote
123	ALBENS VICTOR	8/9/06	Town of Hackettstown, County of Warren	PNC Bank	\$4,254.12	5114837	Allied Barton	Emily R. Coote
124	ALBENS VICTOR	8/14/06	Borough of Stanhope, County of Sussex	PNC Bank	\$943.51	5114846	Allied Barton	Albens Victor
125	ERNST FRANCOIS, ALBENS VICTOR, RITHA SALUSTE, BERTHA CAJUSTE	8/14/06	Town of Newton, County of Sussex	PNC Bank	\$917.41	5114847	Allied Barton	Bertha B. Cajuste

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
126	ERNST FRANCOIS, ALBENS VICTOR, RITHA SALUSTE, BERTHA CAJUSTE	8/14/06	Borough of Stanhope, County of Sussex	PNC Bank	\$938.03	5114848	Allied Barton	Bertha B. Cajuste
127	ALBENS VICTOR	8/14/06	Township of Hillsborough, County of Somerset	PNC Bank	\$976.11	5114852	Allied Barton	Matthew H. Richards
128	ALBENS VICTOR	8/14/06	Borough of Raritan, County of Somerset	PNC Bank	\$934.41	5114853	Allied Barton	Matthew H. Richards
129	ALBENS VICTOR	8/14/06	Township of Piscataway, County of Middlesex	Commerce Bank	\$4,500.00	395	Camilla Mishoe	Sakinah A. Eure
130	ALBENS VICTOR	8/14/06	Stirling, Township of Long Hill, County of Morris	PNC Bank	\$984.16	5114849	Allied Barton	Sakinah A. Eure
131	ERNST FRANCOIS, ALBENS VICTOR, RITHA SALUSTE, BERTHA CAJUSTE	8/15/06	Borough of Palisades Park, County of Bergen	PNC Bank	\$937.86	5114855	Allied Barton	Farah Godard
132	ERNST FRANCOIS, ALBENS VICTOR, RITHA SALUSTE, BERTHA CAJUSTE	8/15/06	Township of Teaneck, County of Bergen	PNC Bank	\$954.12	5114854	Allied Barton	Farah Godard
133	KENNETH ROBERTS	8/25/06	Township of East Windsor, County of Mercer	Commerce Bank	\$2,400.37	1133	Roseland Spinal Rehabilitation PC	Marcus Harris
134	KENNETH ROBERTS	8/28/06	Township of Mount Laurel, County of Burlington	Commerce Bank	\$2,400.00	1134	Roseland Spinal Rehabilitation PC	Marcus Harris

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
135	KENNETH ROBERTS	8/28/06	Township of Willingboro, County of Burlington	Commerce Bank	\$2,200.00	42500	Demarite Industries, LLC	Marcus Harris
136	ALBENS VICTOR	8/30/06	Township of Union, County of Union	Bank of America	\$7,800.00	2804	Park Avenue Talent LTD	Ileola M. Allen
137	ALBENS VICTOR, ASHLEY BROWN	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$843.51	22382	Motivated Security	Ashley Brown
138	ALBENS VICTOR, ASHLEY BROWN	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$856.14	22383	Motivated Security	Ashley Brown
139	ALBENS VICTOR	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$806.29	22384	Motivated Security	Charles Palmer
140	ALBENS VICTOR	8/31/06	Township of South Orange, County of Essex	PNC Bank	\$831.74	22385	Motivated Security	Charles Palmer
141	ALBENS VICTOR	8/31/06	City of Jersey City, County of Hudson	Bank of America	\$7,800.00	2806	Park Avenue Talent LTD	Ileola M. Allen
142	ERNST FRANCOIS	9/1/06	Township of Middletown, County of Monmouth	Commerce Bank	\$2,000.00	1005	Yademine Compere	Linda Jules
143	ERNST FRANCOIS	9/1/06	Township of Hazlet, County of Monmouth	Commerce Bank	\$2,000.00	1007	Yademine Compere	Linda Jules
144	KENNETH ROBERTS	9/11/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,406.54	7082	Ken Smith Lincoln Mercury	Marcus Harris
145	KENNETH ROBERTS	9/11/06	Williamstown, Township of Monroe, County of Gloucester	Commerce Bank	\$2,406.54	7085	Ken Smith Lincoln Mercury	Marcus Harris
146	KENNETH ROBERTS	9/11/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,200.00	7088	Ken Smith Lincoln Mercury	Marcus Harris
147	ALBENS VICTOR	9/12/06	City of Newark, County of Essex	Bank of America	\$7,800.00	2824	Park Avenue Talent LTD	Lamont D. Willis

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
148	ALBENS VICTOR	9/13/06	Township of Montclair, County of Essex	Bank of America	\$8,200.00	2830	Park Avenue Talent LTD	Lamont D. Willis
149	ALBENS VICTOR	9/14/06	Borough of Bergenfield, County of Bergen	Bank of America	\$8,600.00	2838	Park Avenue Talent LTD	Kenyetta Banks
150	ALBENS VICTOR	9/15/06	Township of Cranford, County of Union	Commerce Bank	\$5,200.00	295450	Lightolier	Krystal A. Harte
151	ALBENS VICTOR	9/15/06	City of Jersey City, County of Hudson	Bank of America	\$8,600.00	168033688	Motivated Security Services	Kenyetta Banks
152	ALBENS VICTOR	9/18/06	Town of Westfield, County of Union	Commerce Bank	\$5,847.63	61817	Community Access Unlimited, Inc.	Krystal A. Harte
153	ALBENS VICTOR	9/18/06	City of Newark, County of Essex	Bank of America	\$7,700.00	2848	Park Avenue Talent LTD	Edwin R. Nunev
154	ALBENS VICTOR	9/18/06	City of Jersey City, County of Hudson	Bank of America	\$4,600.00	3369333699	Motivated Security Services	Kenyetta Banks
155	ALBENS VICTOR, ASHLEY BROWN	9/19/06	Township of South Orange, County of Essex	PNC Bank	\$523.64	3369333703	Motivated Security Services	Gregory Salters
156	ALBENS VICTOR	9/19/06	City of Newark, County of Essex	Bank of America	\$8,200.00	2850	Park Avenue Talent LTD	Edwin R. Nunev
157	ALBENS VICTOR	9/20/06	Township of Union, County of Union	Bank of America	\$8,200.00	2852	Park Avenue Talent LTD	Bridgett L. Love
158	ALBENS VICTOR, VANESSA BROWN	9/21/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,976.82	209743	The Blood Center of New Jersey, Inc.	Vanessa L. Brown
159	ALBENS VICTOR	9/21/06	City of Jersey City, County of Hudson	Bank of America	\$8,600.00	2854	Park Avenue Talent LTD	Bridgett L. Love

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
160	ROOSEVELT THELUSMA	9/22/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,907.11	209744	The Blood Center of New Jersey, Inc.	Roosevelt Thelusma
161	ALBENS VICTOR	9/22/06	City of Newark, County of Essex	Bank of America	\$8,400.00	295453	Lightolier	Bridgett L. Love
162	ALBENS VICTOR, JEFF DIEURILUS	9/24/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,954.72	209755	The Blood Center of New Jersey, Inc.	Jeff Deiurelus
163	ALBENS VICTOR	9/25/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,854.67	209758	The Blood Center of New Jersey, Inc.	Caron A. Romans
164	ALBENS VICTOR	9/25/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,852.88	209760	The Blood Center of New Jersey, Inc.	Janina M. Bolden- McCall
165	KENNETH ROBERTS	9/25/06	Borough of Glassboro, County of Gloucester	Commerce Bank	\$2,375.00	59035	The Blood Center of New Jersey, Inc.	Marcus Harris
166	KENNETH ROBERTS	9/25/06	Township of Washington, County of Gloucester	Commerce Bank	\$2,575.00	59038	The Blood Center of New Jersey, Inc.	Marcus Harris
167	KENNETH ROBERTS	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
168	KENNETH ROBERTS	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
169	ROOSEVELT THELUSMA	9/25/06	Borough of South Plainfield, County of Middlesex	Commerce Bank	\$4,923.13	209756	The Blood Center of New Jersey, Inc.	Roosevelt Thelusma
170	ALBENS VICTOR	9/25/06	Borough of Garwood, County of Union	Bank of America	\$6,731.19	209767	The Blood Center of New Jersey, Inc.	Tyrell Bell

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
171	KENNETH ROBERTS	9/26/06	Town of Morristown, County of Morris	Bank of America	\$5,475.00	59085	The Blood Center of New Jersey, Inc.	Sherry Williams
172	KENNETH ROBERTS	9/27/06	Township of Berkeley Heights, County of Union	Commerce Bank	\$5,375.00	59057	The Blood Center of New Jersey, Inc.	Godje Abasse
173	KENNETH ROBERTS	9/27/06	Borough of Madison, County of Morris	Bank of America	\$5,475.00	59105	The Blood Center of New Jersey, Inc.	Sherry Williams
174	KENNETH ROBERTS	9/27/06	Gillette, Township of Long Hill, County of Morris	Commerce Bank	\$5,575.00	59067	The Blood Center of New Jersey, Inc.	Godje Abasse
175	ALBENS VICTOR	9/29/06	Township of Bloomfield, County of Essex	Commerce Bank	\$968.56	115412	Georgetowne Group, LP	Desire Robinson
176	ALBENS VICTOR	10/2/06	City of Rahway, County of Union	Commerce Bank	\$1,081.65	115425	Georgetowne Group, LP	Peter Sorge
177	ALBENS VICTOR	10/11/06	City of Bayonne, County of Hudson	PNC Bank	\$493.74	5071213	Allied Barton Security Services	Linda Robinson
178	ALBENS VICTOR	10/12/06	City of Bayonne, County of Hudson	PNC Bank	\$497.38	5071212	Allied Barton Security Services	Linda Robinson
179	ALBENS VICTOR	10/12/06	Township of Bloomfield, County of Essex	PNC Bank	\$1,071.54	162982	Bowles Corporate Services, Inc.	Charles M. Tyler
180	ALBENS VICTOR	10/12/06	Township of Montclair, County of Essex	Bank of America	\$7,900.00	232759	Wells Fargo Financial	David F. Coleman, Jr.
181	ALBENS VICTOR	10/13/06	Township of Edison, County of Middlesex	PNC Bank	\$489.72	5071219	Allied Barton Security Services	Peter Sorge
182	ALBENS VICTOR	10/13/06	City of Bayonne, County of Hudson	PNC Bank	\$1,073.56	162993	Bowles Corporate Services, Inc.	Linda Robinson

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
183	ALBENS VICTOR	10/13/06	City of Clifton, County of Passaic	PNC Bank	\$473.92	162989	Bowles Corporate Services, Inc.	Diana Huggins
184	ALBENS VICTOR	10/13/06	City of Clifton, County of Passaic	PNC Bank	\$489.78	162990	Bowles Corporate Services, Inc.	Diana Huggins
185	ALBENS VICTOR	10/13/06	Township of Montclair, County of Essex	Bank of America	\$8,800.00	232790	Wells Fargo Financial	David F. Coleman, Jr.
186	ALBENS VICTOR	10/16/06	Township of North Brunswick, County of Middlesex	PNC Bank	\$496.75	5071218	Allied Barton Security Services	Peter Sorge
187	ALBENS VICTOR	10/16/06	City of Jersey City, County of Hudson	PNC Bank	\$973.65	163000	Bowles Corporate Services, Inc.	Diana Huggins
188	ALBENS VICTOR	10/16/06	City of Bayonne, County of Hudson	PNC Bank	\$1,086.34	163006	Bowles Corporate Services, Inc.	Desire Robinson
189	ALBENS VICTOR	10/16/06	Borough of Glen Ridge, County of Essex	Bank of America	\$8,300.00	295496	Lightolier	David F. Coleman, Jr.
190	ALBENS VICTOR	10/18/06	Township of South Brunswick, County of Middlesex	Bank of America	\$9,200.00	7168	Automated Management	David F. Coleman, Jr.
191	ALBENS VICTOR	10/18/06	Borough of Glen Ridge, County of Essex	Bank of America	\$8,600.00	295499	Lightolier	David F. Coleman, Jr.
192	ALBENS VICTOR	10/20/06	Township of Ewing, County of Mercer	Bank of America	\$7,210.00	18456	New Jersey Turnpike Authority	Stephane A. Celestin
193	ALBENS VICTOR	10/23/06	Township of Montclair, County of Essex	Bank of America	\$7,950.00	18457	New Jersey Turnpike Authority	Shonda N. Sterling
194	ALBENS VICTOR	10/25/06	Township of Pennsauken, County of Camden	Bank of America	\$4,900.00	798605	The Leukemia & Lymphoma Society	Doretha L. Powell

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
195	ALBENS VICTOR	10/25/06	Borough of Bergenfield, County of Bergen	Bank of America	\$7,800.00	6225943	Allied Barton Spectaguard Acuisition	Adeyinka Oyenuga
196	ALBENS VICTOR	10/25/06	Township of Montclair, County of Essex	Bank of America	\$8,750.00	295503	Lightolier	Shonda N. Sterling
197	ALBENS VICTOR	10/25/06	City of Beverly, County of Burlington	Bank of America	\$5,800.00	77936	Dell Marketing L.P.	Doretha L. Powell
198	ALBENS VICTOR	10/25/06	Borough of Dumont, County of Bergen	Bank of America	\$7,600.00	6225940	Allied Barton Spectaguard Acuisition	Shatoyia Johnson
199	ALBENS VICTOR	10/26/06	Marlton, Township of Evesham, County of Burlington	Bank of America	\$4,975.00	295504	Lightolier	Doretha L. Powell
200	ALBENS VICTOR	10/26/06	Township of Mount Laurel, County of Burlington	Bank of America	\$4,900.00	18461	New Jersey Turnpike Authority	Doretha L. Powell
201	ALBENS VICTOR	10/27/06	Borough of Oradell, County of Bergen	Wachovia Bank	\$2,800.00	6225946	Allied Barton Spectaguard Acuisition	Kelly Montes
202	ALBENS VICTOR, VANESSA BROWN	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
203	KENNETH ROBERTS	10/28/06	Township of Pennsauken, County of Camden	Commerce Bank	\$3,400.64	4677	Kaplow & Co. Insurance	Marcus Harris
204	ALBENS VICTOR	10/30/06	Township of Washington, County of Gloucester	Bank of America	\$5,700.00	4180934	CDG Management, LLC	Tamena S. Evans
205	ALBENS VICTOR	10/30/06	Borough of Paramus, County of Bergen	Bank of America	\$8,300.00	232819	Wells Fargo Financial	D.G.

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
206	ALBENS VICTOR	10/30/06	Borough of Laurel Springs, County of Camden	Bank of America	\$5,800.00	798617	The Leukemia & Lymphoma Society	Tamena S. Evans
207	ALBENS VICTOR	10/31/06	Township of Mount Holly, County of Burlington	Bank of America	\$4,500.00	18465	New Jersey Turnpike Authority	Tamena S. Evans
208	ALBENS VICTOR	10/31/06	Borough of Paramus, County of Bergen	Bank of America	\$8,540.00	18467	New Jersey Turnpike Authority	D.G.
209	ALBENS VICTOR	10/31/06	Township of Mount Holly, County of Burlington	Bank of America	\$9,500.00	612360	Guardsman Products Business Unit	Tamena S. Evans
210	ALBENS VICTOR	11/1/06	City of Newark, County of Essex	Bank of America	\$7,500.00	295508	Lightolier	D.G.
211	ALBENS VICTOR	11/2/06	Township of Union, County of Union	Commerce Bank	\$7,500.00	18472	New Jersey Turnpike Authority	Shanae J. Knight
212	ALBENS VICTOR	11/07/06	Township of Voorhees, County of Camden	Bank of America	\$8,500.00	18473	New Jersey Turnpike Authority	Kathleen R. Hughes
213	ALBENS VICTOR	11/8/06	Borough of Roselle, County of Union	Bank of America	\$7,800.00	18475	New Jersey Turnpike Authority	Jessica Maurice
214	ALBENS VICTOR	11/8/06	City of Bordentown, County of Burlington	Bank of America	\$9,500.00	253736	Wachovia Bank Cashier's Check	Kathleen R. Hughes
215	ALBENS VICTOR	11/15/06	Township of South Orange, County of Essex	Sovereign Bank	\$977.76	115	PGM & Assoc.	Tamika Snowden
216	ALBENS VICTOR	11/15/06	Township of South Orange, County of Essex	Sovereign Bank	\$986.14	116	PGM & Assoc.	Tamika Snowden
217	ALBENS VICTOR	11/17/06	Township of Neptune, County of Monmouth	Bank of America	\$4,800.00	18479	New Jersey Turnpike Authority	Jammie Tate

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
218	ALBENS VICTOR	11/20/06	Township of Cherry Hill, County of Camden	Bank of America	\$4,900.00	295514	Lightolier	Emilio Thorpe
219	ALBENS VICTOR	11/20/06	Marlton, Township of Evesham, County of Burlington	Bank of America	\$4,800.00	18480	New Jersey Turnpike Authority	Emilio Thorpe
220	ALBENS VICTOR	11/20/06	Township of Wall, County of Monmouth	Bank of America	\$4,900.00	77944	Dell Marketing, L.P.	Jammie Tate
221	ALBENS VICTOR	11/21/06	Township of Wall, County of Monmouth	Bank of America	\$4,900.00	612369	Guardsman Products Business Unit	Duane Homes
222	ALBENS VICTOR, VANESSA BROWN	11/24/06	Borough of Cresskill, County of Bergen	PNC Bank	\$2,463.72	52350	Local 1233 Federal Credit Union	Vanessa L. Brown
223	ALBENS VICTOR, VANESSA BROWN	11/24/06	Borough of Tenefly, County of Bergen	PNC Bank	\$2,265.71	52351	Local 1233 Federal Credit Union	Vanessa L. Brown
224	ROOSEVELT THELUSMA	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
225	ROOSEVELT THELUSMA	12/7/06	Township of Millburn, County of Essex	Bank of New York	\$2,463.41	8947	High Mountain Construction, Inc.	Roosevelt Thelusma
226	ALBENS VICTOR, RITHA SALUSTE	1/29/07	Township of South Orange, County of Essex	Bank of America	\$979.14	112301	Pilgrim Insurance Company	Ritha Saluste
227	ALBENS VICTOR	3/21/07	Township of Fairfield, County of Essex	Commerce Bank	\$954.11	1543091	The Proformance Insurance Co.	Albels Victor

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

COUNTS TWO HUNDRED TWENTY-EIGHT THROUGH TWO HUNDRED THIRTY-FIVE

(Issuing a Bad Check - Third Degree)

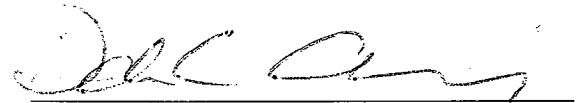
ROOSEVELT THELUSMA

at the times and places set forth herein, elsewhere, and within the jurisdiction of this Court, knowingly did issue the specified checks, knowing that the bank on which the checks were drawn would not honor said checks, all as set forth herein, and in Count One of this Indictment:

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
228	ROOSEVELT THELUSMA	8/14/06	Township of Middletown, County of Monmouth	Bank of America	\$3,380.00	225	Roosevelt Thelusma	Sherelle P. Belton
229	ROOSEVELT THELUSMA	8/14/06	Borough of Red Bank, County of Monmouth	Bank of America	\$3,380.00	226	Roosevelt Thelusma	Sherelle P. Belton
230	ROOSEVELT THELUSMA	8/17/06	Township of Middletown, County of Monmouth	Bank of America	\$3,000.00	124	Roosevelt Thelusma	Michelle Horton
231	ROOSEVELT THELUSMA	8/17/06	Township of Holmdel, County of Monmouth	Bank of America	\$4,250.00	125	Roosevelt Thelusma	Michelle Horton
232	ROOSEVELT THELUSMA	8/21/06	Township of Toms River, County of Ocean	Wachovia Bank	\$2,000.00	110	Roosevelt Thelusma	Linda Jules
233	ROOSEVELT THELUSMA	8/21/06	Township of Lakewood, County of Ocean	Wachovia Bank	\$2,830.00	117	Roosevelt Thelusma	Linda Jules
234	ROOSEVELT THELUSMA	8/21/06	Township of Howell, County of Monmouth	Wachovia Bank	\$2,000.00	124	Roosevelt Thelusma	Linda Jules

Count	Defendants	Date(s)	Municipality/ County	Victim	Check Amount	Check #	Account	Payee
235	ROOSEVELT THELUSMA	8/22/06	Township of Manalapan, County of Monmouth	Wachovia Bank	\$2,000.00	241	Roosevelt Thelusma	Linda Jules

contrary to the provisions of N.J.S.A. 2C:21-5, and 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: 6/30/09

FILED

JUL 07 2009

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

**SUPERIOR COURT
CLERK'S OFFICE**

State Grand Jury

Number SGJ572-09-2(1)

Superior Court

Docket Number

09-06-00123-S

RECEIVED

JAN 30 2009

**SUPERIOR COURT
CLERK'S OFFICE**

STATE OF NEW JERSEY)

v.)

ERNST FRANCOIS)

also known as)

JR)

ALBENS VICTOR)

also known as)

VIC)

also known as)

JP)

KENNETH ROBERTS)

also known as)

BLACK)

WOODY ARMAND)

ROOSEVELT THELUSMA)

also known as)

BIG)

JEFF DIEURILUS)

also known as)

BIGGIE)

BERTHA CAJUSTE)

QUANISE FREEMAN)

SHAMIRA CHAMPAGNE)

ASHLEY BROWN)

VANESSA BROWN)

and)

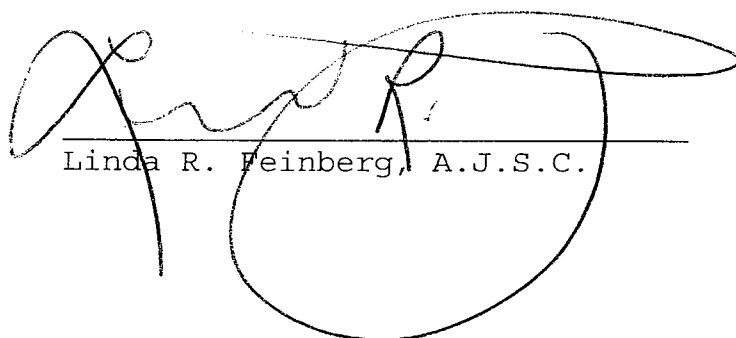
RITHA SALUSTE)

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 30th day of June, 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.

RECEIVED

JAN 30 2009

FILED

JUL 07 2009

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

SUPERIOR COURT
CLERK'S OFFICE

SUPERIOR COURT
CLERK'S OFFICE

State Grand Jury

Number SGJ572-09-2(1)

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ORDER OF VENUE

KENNETH ROBERTS)

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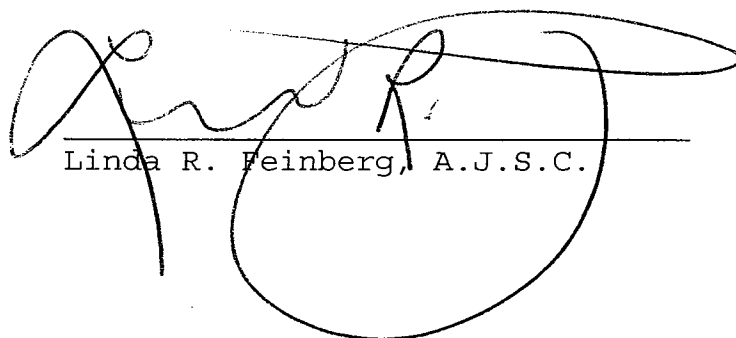
and)

RITHA SALUSTE)

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