

FILED

JUL 28 2010

**8 SUPERIOR COURT
OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ593-10-3

Superior Court

Docket Number 10 - 07 - 00097 - S

STATE OF NEW JERSEY)

v.)

INDICTMENT

DENISE NICOLE JOHNSON,)

ANTHONY LAMONT TAYLOR)

and)

)

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

COUNT ONE

(Official Misconduct - Second Degree)

DENISE NICOLE JOHNSON

between on or about March 1, 2006 and on or about September 30, 2006, at the Boro of Paulsboro, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court did commit the offense of Official Misconduct, in that the said DENISE NICOLE JOHNSON, a public servant, acting with the purpose to obtain a benefit for herself or another, or to injure or deprive another of a benefit in excess of \$200, did commit acts relating

to her office, constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, and the said DENISE NICOLE JOHNSON then and there being a public servant, to wit: a Home Energy Assistance Aide for Tri-County Community Action Agency, a sub-grantee of the New Jersey Department of Community Affairs, having been charged with official functions and duties, among others, to assist applicants with completing their New Jersey Department of Community Affairs Home Energy Assistance Program applications, to ensure the documentation required for completing Home Energy Assistance Program applications is correct, to accurately enter Home Energy Assistance Program application data into the New Jersey Department of Community Affairs system, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did knowingly submit false information in Home Energy Assistance Program applications, with the purpose to secure a benefit for herself in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2 and against the peace of this State, the government and dignity of same.

COUNT TWO

(Theft By Deception - Third Degree)

DENISE NICOLE JOHNSON,

ANTHONY LAMONT TAYLOR,

AND

between on or about March 1, 2006 and on or about August 31, 2009, at the Boro of Paulsboro, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, purposely did obtain from the New Jersey Department of Community Affairs, home energy assistance funds from the Home Energy Assistance Program having a value of approximately \$28,200 by deception, with each of the individual named defendants receiving over \$500 of the proceeds, by creating or reinforcing false impressions on applications submitted to the New Jersey Department of Community Affairs, specifically, making entries in Home Energy Assistance applications that contained false information regarding the applicants' personal, financial, or domicile circumstances, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT THREE

(Misapplication of Entrusted Property and Property of Government
- Third Degree)

DENISE NICOLE JOHNSON,

ANTHONY LAMONT TAYLOR,

AND

between on or about March 1, 2006 and on or about August 31, 2009, at the Boro of Paulsboro, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, knowingly did apply or dispose of property, belonging to the government, to wit: approximately \$28,200 in home energy assistance funds from the New Jersey Department of Community Affairs Home Energy Assistance Program, in a manner which the said DENISE NICOLE JOHNSON, ANTHONY LAMONT TAYLOR, and _____ knew was unlawful and involved substantial risk of loss or detriment to the owner of the property, thereby deriving a benefit for each individual named defendant of over \$1,000, contrary to the provisions of N.J.S.A. 2C:21-15, N.J.S.A. 2C:5-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT FOUR

(Financial Facilitation of Criminal Activity - Third Degree)

DENISE NICOLE JOHNSON,

ANTHONY LAMONT TAYLOR,

AND

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as coconspirators but not as defendants herein, between on or about March 1, 2006 and on or about August 31, 2009, at the Baro of Paulsboro, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, knowingly did engage in one or more financial transactions involving property in the amount of less than \$75,000, which was known or which a reasonable person would believe to be derived from criminal activity to wit: Theft By Deception, and/or Misapplication of Entrusted Property and Property of Government or Financial Institution, with the purpose of facilitating or promoting that criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, specifically, the said DENISE NICOLE JOHNSON, ANTHONY LAMONT TAYLOR, and

accepted checks issued from the New Jersey Department of Community Affairs Home Energy Assistance Program, having a value

of approximately \$22,725 which were payable to individuals and their home heating supplier, which they knew were to be used for the sole purpose of procuring home heating fuel and could be deposited only into the account of a home heating supplier, and subsequently exchanged and cashed these benefit checks through third parties for personal, non-heating benefits, specifically for cash or checks payable solely to each of them individually, to disguise the nature, location, source, ownership, or control of said benefits, contrary to the provisions of N.J.S.A. 2C:21-25, N.J.S.A. 2C:21-27, N.J.S.A. 2C:5-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.

COUNT FIVE

(Tampering With Public Records or Information - Third Degree)

DENISE NICOLE JOHNSON₁

ANTHONY LAMONT TAYLOR₁

AND

between on or about March 1₁ 2006 and on or about August 31₁ 2009₁ at the Boro of Paulsboro₁ in the County of Gloucester/elsewhere₁ and within the jurisdiction of this Court₁ with purpose to defraud or injure, did make a false entry in a record/document or thing belonging to₁ received-or kept by₁ the government for information or record₁ or required by law to be kept by others for information of the government₁ that is₁ the false entries in applications for financial assistance submitted to the New Jersey Department of Community Affairs Home Energy Assistance Program₁ knowing the entries to be false₁ contrary to the provisions of N.J.S.A. 2C:28-7 (a) (1), N.J.S.A. 2C:5-21 and N.J.S.A. 2C:2-6₁ and against the peace of this State₁ the government and dignity of same.

COUNT SIX

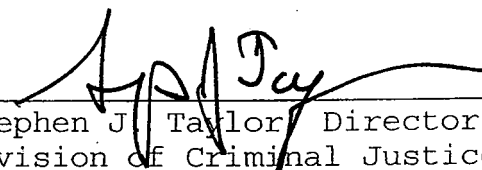
(Falsifying Records - Fourth Degree)

DENISE NICOLE JOHNSON

ANTHONY LAMONT TAYLOR,


AND

between on or about March 1, 2006 and on or about August 31, 2009, at the Boro of Paulsboro, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, with purpose to deceive or injure another or to conceal a wrongdoing, knowing it to contain a false statement or information, did utter a writing or record, that is, applications for financial assistance submitted to the New Jersey Department of Community Affairs Home Energy Assistance Program, contrary to the provisions of N.J.S.A. 2C:21-4(a), N.J.S.A. 2C:5-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 7/28/2010

R:LED:

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Cl J:Def(<=; OFPICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL


State Grand Jury
Number SGJ593-10-3
Superior Court
Docket Number 10 - 0 " - 00 () 9, :;7'---=8

STATE OF NEW JERSEY)	
v.)	ORDER OF VENUE
DENISE NICOLE JOHNSON)	
ANTHONY LAMONT TAYLOR)	
and)	
)	

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this ~~JS~~ day of **h**, 2010, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Gloucester 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 Gloucester for filing.


Pedro J. Jimenez, Jr., J.S.C.