

FILED

FEB 3 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ615-12-17

Superior Court

Docket Number 12-02-00024-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

PATRICK ANDERSON)

RONALD L. BLANCHETTE, JR.)

and)

AAA INVESTMENTS)

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

COUNT ONE

(Theft by Deception - Second Degree)

PATRICK ANDERSON

and

AAA INVESTMENTS,

on or about February 9, 2007, at the City of Orange, in the
County of Essex, elsewhere, and within the jurisdiction of this
Court, purposely did obtain the property of another by deception,
in an amount of \$75,000 or more, to wit approximately \$999,000
dollars, by creating or reinforcing false impressions to Bear
Stearns Residential Mortgage Corporation that mortgage loan
applications and U.S. Department of Housing and Urban Development

(HUD) settlement forms contained true and accurate information, WHEREAS IN TRUTH AND IN FACT, as the said PATRICK ANDERSON, and AAA INVESTMENTS., well knew, the submitted mortgage loan applications and U.S. Department of Housing and Urban Development (HUD) settlement forms did not contain true and accurate information and thereby caused the said Bear Stearns Residential Mortgage Corporation to provide mortgages in an amount of \$75,000 or more, to wit approximately \$999,000 dollars, contrary to the provisions of N.J.S.A 2C:20-4, N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Second Degree)

PATRICK ANDERSON

RONALD L. BLANCHETTE, JR.

and

AAA INVESTMENTS,

on or about August 6, 2008, at the City of Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did obtain the property of another by deception, in an amount of \$75,000 or more, to wit approximately \$337,487 dollars, by creating or reinforcing false impressions to American Financial Resources, Inc., that mortgage loan applications and U.S. Department of Housing and Urban Development (HUD) settlement forms contained true and accurate information, WHEREAS IN TRUTH AND IN FACT, as the said PATRICK ANDERSON, RONALD L. BLANCHETTE, JR., and AAA INVESTMENTS., well knew, the submitted mortgage loan applications and U.S. Department of Housing and Urban Development (HUD) settlement forms did not contain true and accurate information and thereby caused the said American Financial Resources, Inc., to provide mortgages in an amount of \$75,000 or more, to wit approximately \$337,487 dollars, contrary to the provisions of N.J.S.A 2C:20-4, N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Financial Facilitation of Criminal Activity - Third Degree)

PATRICK ANDERSON

and

AAA INVESTMENTS,

between on or about August 6, 2008 and August 11, 2008, at the City of Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did engage in transactions involving property, in an amount less than \$75,000, known or which a reasonable person would believe to be derived from criminal activity, knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is the said PATRICK ANDERSON and AAA INVESTMENTS did engage in the transactions of issuing, receiving, wiring and causing to be submitted checks, in an amount less than \$75,000, known to be derived from criminal activity, 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 which the said PATRICK ANDERSON, and AAA INVESTMENTS., knew to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25(b)(2)(a), N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Theft by Deception - Second Degree)

PATRICK ANDERSON

RONALD L. BLANCHETTE, JR.

and

AAA INVESTMENTS,

on or about August 29, 2008, at the City of Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did obtain the property of another by deception, in an amount of \$75,000 or more, to wit approximately \$445,500 dollars, by creating or reinforcing false impressions to Sovereign Bank, that mortgage loan applications and U.S. Department of Housing and Urban Development (HUD) settlement forms contained true and accurate information, WHEREAS IN TRUTH AND IN FACT, as the said PATRICK ANDERSON, RONALD L. BLANCHETTE, JR., and AAA INVESTMENTS., well knew, the submitted mortgage loan applications and U.S. Department of Housing and Urban Development (HUD) settlement forms did not contain true and accurate information and thereby caused the said Sovereign Bank, to provide mortgages in an amount of \$75,000 or more, to wit approximately \$445,500 dollars, contrary to the provisions of N.J.S.A 2C:20-4, N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Theft by Deception - Second Degree)


PATRICK ANDERSON

and

AAA INVESTMENTS,

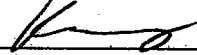
on or about October 27, 2008, at the City of Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did obtain the property of another by deception, in an amount of \$75,000 or more, to wit approximately \$408,000 dollars, by creating or reinforcing false impressions to Golden First Mortgage Corporation that mortgage loan applications and U.S. Department of Housing and Urban Development (HUD) settlement forms contained true and accurate information, WHEREAS IN TRUTH AND IN FACT, as the said PATRICK ANDERSON, and AAA INVESTMENTS., well knew, the submitted mortgage loan applications and U.S. Department of Housing and Urban Development (HUD) settlement forms did not contain true and accurate information and thereby caused the said Golden First Mortgage Corporation, to provide mortgages in an amount of \$75,000 or more, to wit approximately

\$408,000 dollars, contrary to the provisions of N.J.S.A 2C:20-4,
N.J.S.A. 2C:2-6 and against the peace of this State, the
government and dignity of the same.



Boris Moczula, Deputy Director
Division of Criminal Justice

A TRUE BILL:

Brent 
_____, Foreperson

Dated: _____

FILED

FEB 03 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

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STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

PATRICK ANDERSON)

RONALD L. BLANCHETTE, JR.)

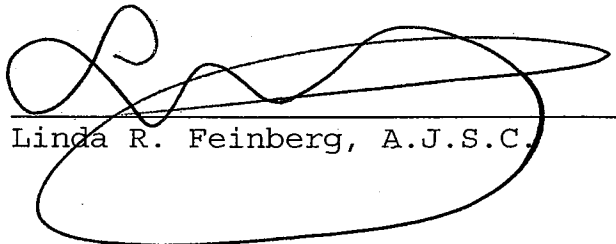
and)

AAA INVESTMENTS)

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

IT IS ORDERED on this 3rd day of February, 2012, pursuant to paragraph 8 of the State Grand Jury Act that the County of Essex 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 Essex for filing.



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