

FILED

APR 27 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ620-12-2
Superior Court
Docket Number 12-04-00081-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

REINA PECK,)
AKA REYNA MORALES,)
AKA REIGNA PECKS,)
AKA RENA PECK,)
AKA ROWENA L. SOLANO,)
AKA STEPHANIE MCGUCKIN,)
AKA STEPHANIE MCGUKIN,)
AKA RAINA MORALES)

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

COUNT ONE

(Theft by Deception - Second Degree)

REINA PECK

between on or about February 9, 2009, and on or about October 2, 2010, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of the State of New Jersey in an aggregate amount of \$75,000.00 or more, that is, approximately \$161,358.00 in Unemployment Insurance (UI) benefits and \$7,075.00 in Federal Additional Compensation Program (FAC) funds, by deception; that is, the said REINA PECK did purposely obtain said unemployment insurance benefits by submitting or causing to be submitted

documents for unemployment insurance benefits in her name and in fictitious names, to the State of New Jersey, thereby creating or reinforcing false impression to the State of New Jersey that she was entitled to unemployment benefits;

WHEREAS IN TRUTH AND IN FACT, as the said REINA PECK then and there well knew, she was not entitled to said unemployment benefits as claimed, all as set forth herein:

Date(s)	Name Used	Amount	Benefit Type
2/9/09 to 9/4/10	REINA PECK	\$30,368.00	Unemployment Insurance (U/I)
2/9/09 to 9/4/10	REINA PECK	\$1,300.00	Federal Additional Compensation Program (FAC)
4/19/09 to 9/20/10	Reyna Morales	\$42,048.00	Unemployment Insurance (U/I)
4/19/09 to 9/20/10	Reyna Morales	\$1,850.00	Federal Additional Compensation Program (FAC)
7/4/09 to 6/19/10	Reigna Pecks	\$29,223.00	Unemployment Insurance (U/I)
7/4/09 to 6/19/10	Reigna Pecks	\$1,275.00	Federal Additional Compensation Program (FAC)
10/11/09 to 9/10/10	Rowena L. Solano	\$16,269.00	Unemployment Insurance (U/I)
10/11/09 to 9/10/10	Rowena L. Solano	\$825.00	Federal Additional Compensation Program (FAC)
1/10/10 to 9/7/10	Stephanie McGuckin	\$14,348.00	Unemployment Insurance (U/I)
1/10/10 to 9/7/10	Stephanie McGuckin	\$850.00	Federal Additional Compensation Program (FAC)

Date(s)	Name Used	Amount	Benefit Type
2/20/10 to 9/4/10	Stephanie McGukin	\$17,400.00	Unemployment Insurance (U/I)
2/20/10 to 9/4/10	Stephanie McGukin	\$725.00	Federal Additional Compensation Program (FAC)
5/9/10 to 9/7/10	Raina Morales	\$5,190.00	Unemployment Insurance (U/I)
5/9/10 to 9/7/10	Raina Morales	\$250.00	Federal Additional Compensation Program (FAC)
7/24/10 to 10/2/10	Rena Peck	\$6,512.00	Unemployment Insurance (U/I)

all contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1) (a), and N.J.S.A. 2C:20-2b(4), and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Impersonation - Second Degree)

REINA PECK

between on or about February 9, 2009, and on or about October 2, 2010, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did impersonate others or assume false identities and committed an act or acts in such assumed characters or false identities for the purpose of obtaining a benefit for herself or another or to injure or defraud another, that is, the said REINA PECK did impersonate other persons or assume false identities, namely Reyna Morales, Reigna Pecks, Rena Peck, Rowena L. Solano, Stephanie McGuckin, Stephanie McGukin, and Raina Morales, and did apply for and receive unemployment insurance benefits in these names and identities, in an amount of \$75,000 or more, that is, approximately \$136,765, all as set forth herein:

Date(s)	Name Used	Amount	Benefit Type
4/19/09 to 9/20/10	Reyna Morales	\$42,048.00	Unemployment Insurance (U/I)
4/19/09 to 9/20/10	Reyna Morales	\$1,850.00	Federal Additional Compensation Program (FAC)
7/4/09 to 6/19/10	Reigna Pecks	\$29,223.00	Unemployment Insurance (U/I)
7/4/09 to 6/19/10	Reigna Pecks	\$1,275.00	Federal Additional Compensation Program (FAC)
10/11/09 to 9/10/10	Rowena L. Solano	\$16,269.00	Unemployment Insurance (U/I)

Date(s)	Name Used	Amount	Benefit Type
10/11/09 to 9/10/10	Rowena L. Solano	\$825.00	Federal Additional Compensation Program (FAC)
1/10/10 to 9/7/10	Stephanie McGuckin	\$14,348.00	Unemployment Insurance (U/I)
1/10/10 to 9/7/10	Stephanie McGuckin	\$850.00	Federal Additional Compensation Program (FAC)
2/20/10 to 9/4/10	Stephanie McGuckin	\$17,400.00	Unemployment Insurance (U/I)
2/20/10 to 9/4/10	Stephanie McGuckin	\$725.00	Federal Additional Compensation Program (FAC)
5/9/10 to 9/7/10	Raina Morales	\$5,190.00	Unemployment Insurance (U/I)
5/9/10 to 9/7/10	Raina Morales	\$250.00	Federal Additional Compensation Program (FAC)
7/24/10 to 10/2/10	Rena Peck	\$6,512.00	Unemployment Insurance (U/I)

contrary to the provisions of N.J.S.A. 2C:21-17a(1), N.J.S.A. 2C:21-17c(3), and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Third Degree)

REINA PECK

between on or about February 9, 2009, and on or about August 2, 2009, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of the State of New Jersey, that is, approximately \$14,196.00 in Disability Insurance (UI) benefits, by deception; that is, the said REINA PECK purposely did obtain Disability Insurance (UI) benefits in the amount of \$14,196 from the State of New Jersey, by deception, in that, she did reinforce the false impression that she was unable to work and was thereby entitled to collect disability insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said REINA PECK well knew, she was not entitled to said benefits, as she did maintain employment during said time period with an employer known as "Service Works," and that she did not report said employment to the State of New Jersey, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Tampering with Public Records or Information - Third Degree)

REINA PECK

between on or about February 9, 2009, and on or about September 4, 2010, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did make, present, or offer for filing a record or document, knowing it to be false, and with the purpose that it be taken as a genuine part of information or record received by or kept by the government for information or record, in that, the said REINA PECK did submit an application for Unemployment Insurance and Additional Compensation Program (FAC) Unemployment benefits to the New Jersey Department of Labor containing false information, that is, statements that she was entitled to Unemployment Insurance and Additional Compensation Program (FAC) Unemployment benefits, with the purpose that it be taken as a genuine part of information or record received by or kept by the government for information or record, contrary to the provisions of N.J.S.A. 2C:28-7(a), and against the peace of this State, the government and dignity of the same.

COUNTS FIVE THROUGH TWELVE

(Tampering with Public Records or Information - Third Degree)

REINA PECK

between on or about February 9, 2009, and on or about October 2, 2010, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, did make, present, or offer for filing records or documents, knowing them to be false, and with the purpose that they be taken as a genuine part of information or record received by or kept by the government for information or record, in that, the said REINA PECK did submit applications for Unemployment Insurance, Additional Compensation Program (FAC) Unemployment, and Disability benefits to the New Jersey Department of Labor in false names, namely, Rena Peck, Reyna Morales, Reigna Pecks, Rena Peck, Rowena L. Solano, Stephanie McGuckin, Stephanie McGukin and Raina Morales, with the purpose that they be taken as a genuine part of information or record received by or kept by the government for information or record, all as set forth herein:

Count	Date	False Information	Benefit Type
5	2/9/09	Rena Peck	Disability Insurance (D/I)
6	4/19/09	Reyna Morales	Unemployment Insurance (U/I) Federal Additional Compensation Program (FAC)
7	7/4/09	Reigna Pecks	Unemployment Insurance (U/I) Federal Additional Compensation Program (FAC)

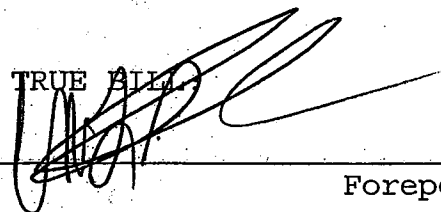
Count	Date	False Information	Benefit Type
8	10/11/09	Rowena L. Solano	Unemployment Insurance (U/I) Federal Additional Compensation Program (FAC)
9	1/10/10	Stephanie McGuckin	Unemployment Insurance (U/I) Federal Additional Compensation Program (FAC)
10	2/20/10	Stephanie McGukin	Unemployment Insurance (U/I) Federal Additional Compensation Program (FAC)
11	5/9/10	Raina Morales	Unemployment Insurance (U/I) Federal Additional Compensation Program (FAC)
12	7/4/09	Rena Peck	Unemployment Insurance (U/I) Federal Additional Compensation Program (FAC)

contrary to the provisions of N.J.S.A. 2C:28-7(a), and against the peace of this State, the government and dignity of the same.



AAG Riza Dagli
Division of Criminal Justice

A TRUE BILL



Foreperson

Date: 4-27-12

FILED

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

APR 27 2012

State Grand Jury Judge

State Grand Jury

Number SGJ620-12-2

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Docket Number 12-04-00081-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

REINA PECK)

a/k/a

REYNA MORALES)

a/k/a

REIGNA PECKS)

a/k/a

RENA PECK)

a/k/a

ROWENA L. SOLANO)

a/k/a

STEPHANIE MCGUCKIN)

a/k/a

STEPHANIE MCGUKIN)


a/k/a

RAINA MORALES)

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

IT IS ORDERED on this 27th day of April, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Camden 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 Camden for filing.


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