

**FILED**

MAR 27 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ617-12-7

Superior Court 12-03-00067-S  
Docket Number

STATE OF NEW JERSEY )

v. )

TERRY E. DILLIGARD II )

**INDICTMENT**

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

COUNT ONE

(Theft by Deception - Second Degree)

TERRY E. DILLIGARD II

between on or about March 9, 2010, and on or about September 27, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of Harrah's Resort and Casino, having an aggregate value of \$75,000 or more, by deception, that is, the said TERRY E. DILLIGARD II did purposely obtain \$165,600 from Harrah's Resort and Casino, by reproducing legitimate casino checks and depositing said checks into an account in his name at the Bank of America, thereby creating or reinforcing the false impressions that said checks were legitimate;

WHEREAS IN TRUTH AND IN FACT, as the said TERRY E. DILLIGARD

II then and there well knew, said checks were not legitimate, 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:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Uttering a Forged Instrument - Third Degree)

TERRY E. DILLIGARD II

on or about September 8, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, knowingly did utter as true to Bank of America check number 070003 drawn on the account of Harrah's Resort and Casino at Wachovia Bank and payable to TERRY E. DILLIGARD II in the amount of \$21,715, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Uttering a Forged Instrument - Third Degree)

TERRY E. DILLIGARD II

on or about September 8, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, knowingly did utter as true to Bank of America check number 070020 drawn on the account of Harrah's Resort and Casino at Wachovia Bank and payable to TERRY E. DILLIGARD II in the amount of \$21,485, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Uttering a Forged Instrument - Third Degree)

TERRY E. DILLIGARD II

on or about September 9, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, knowingly did utter as true to Bank of America check number 066490 drawn on the account of Harrah's Resort and Casino at Wachovia Bank and payable to TERRY E.

DILLIGARD II in the amount of \$16,800, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Uttering a Forged Instrument - Third Degree)

TERRY E. DILLIGARD II

on or about September 9, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, knowingly did utter as true to Bank of America check number 070004 drawn on the account of Harrah's Resort and Casino at Wachovia Bank and payable to TERRY E. DILLIGARD II in the amount of \$16,675, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Uttering a Forged Instrument - Third Degree)

TERRY E. DILLIGARD II

on or about September 21, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, knowingly did utter as true to Bank of America check number 070008 drawn on the account of Harrah's Resort and Casino at Wachovia Bank and payable to TERRY E. DILLIGARD II in the amount of \$13,000, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Uttering a Forged Instrument - Third Degree)

TERRY E. DILLIGARD II

on or about September 22, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, knowingly did utter as true to Bank of America check number 070019 drawn on the account of Harrah's Resort and Casino at Wachovia Bank and payable to TERRY E. DILLIGARD II in the amount of \$23,425, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.



COUNT EIGHT

(Uttering a Forged Instrument - Third Degree)

TERRY E. DILLIGARD II

on or about September 24, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, knowingly did utter as true to Bank of America check number 066483 drawn on the account of Harrah's Resort and Casino at Wachovia Bank and payable to TERRY E. DILLIGARD II in the amount of \$5,000, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Uttering a Forged Instrument - Third Degree)

TERRY E. DILLIGARD II

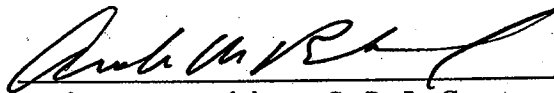
on or about September 27, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, knowingly did utter as true to Bank of America check number 066497 drawn on the account of Harrah's Resort and Casino at Wachovia Bank and payable to TERRY E. DILLIGARD II in the amount of \$18,000, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Uttering a Forged Instrument - Third Degree)


TERRY E. DILLIGARD II

on or about October 15, 2010, at the City of Atlantic City, in the County of Atlantic, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, knowingly did utter as true to Bank of America check number 070017 drawn on the account of Harrah's Resort and Casino at Wachovia Bank and payable to TERRY E. DILLIGARD II in the amount of \$29,500, knowing the same to be forged or falsely made, contrary to the provisions of N.J.S.A. 2C:21-1a(3), and against the peace of this State, the government and dignity of the same.



Andrew Butchko, S.D.A.G.  
Chief, Specialized Crimes Bureau

A TRUE BILL:

  
\_\_\_\_\_  
, Foreperson

Dated: 3/27/12

**FILED**

MAR 27 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ617-12-7

Superior Court

Docket Number 12-03-00067-S

STATE OF NEW JERSEY )

v. )

TERRY E. DILLIGARD II )

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 *27<sup>th</sup>* day of *March*, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Atlantic 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 Atlantic for filing.

*Mary C. Jacobson*  
Mary C. Jacobson, A.J.S.C.