

SUPERIOR COURT OF N.J.
FILED

JUN 13 2008

Christian P. Higgins
Acting Clerk

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ555-08-29

Superior Court

Docket Number 08-06-00134-S

STATE OF NEW JERSEY)

v.)

ANTHONY WOOD)

also known as)

Tone)

also known as)

Anthony M. Bickerstaff)

[REDACTED])

and)

WILLIAM ROMAN)

INDICTMENT

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

COUNT ONE

(Conspiracy - Second Degree)

ANTHONY WOOD

[REDACTED]

and

WILLIAM ROMAN

who are named as co-conspirators, between on or about March 1,
2007 and on or about October 30, 2007, at the Township of Mt.
Laurel, in the County of Burlington, elsewhere, and within the
jurisdiction of this Court, with the purpose of promoting or

facilitating the commission of the crime of Computer Criminal Activity, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime or an attempt or solicitation to commit such a crime; or

B. One or more of them would aid in the planning, attempt or solicitation or commission of said crime, that is:

Computer Criminal Activity, N.J.S.A. 2C:20-25e, by purposely or knowingly and without authorization, or in excess of authorization, obtaining, taking, copying or using any data, data base, computer program, computer software, personal identifying information, or other information stored in a computer, computer network, computer system, computer equipment or computer storage medium where the data, data base, computer program, computer software, or information contained information that is protected from disclosure by law, specifically, N.J.S.A. 56:8-161 et seq. and 15 U.S.C.S. 6801 et seq.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Computer Criminal Activity - Second Degree)

ANTHONY WOOD

[REDACTED]

and

WILLIAM ROMAN

between on or about March 1, 2007 and on or about October 30, 2007, at the Township of Mt. Laurel, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did purposely or knowingly and without authorization, or in excess of authorization, obtain, take, copy or use any data, data base, computer program, computer software, personal identifying information, or other information stored in a computer, computer network, computer system, computer equipment or computer storage medium where the data, data base, computer program, computer software, or information containing information that is protected from disclosure by law, that is, the said ANTHONY WOOD, [REDACTED], and WILLIAM ROMAN did purposely or knowingly and without the authorization of a financial institution known to the Grand Jurors obtained, took, copied, or used personal identifying information on Boarding Data sheets protected from disclosure by N.J.S.A. 56:8-161 et seq. and 15 U.S.C.S. 6801 et seq., contrary to the provisions of N.J.S.A. 2C:20-25e 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 of Identity - Second Degree)

ANTHONY WOOD

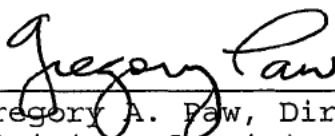
[REDACTED]

and

WILLIAM ROMAN

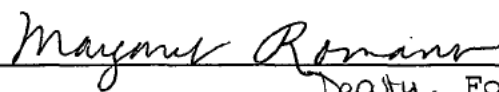
between on or about March 1, 2007 and on or about May 26, 2008, at the Township of Mt. Laurel, in the County of Burlington, elsewhere, and within the jurisdiction of this Court, obtained any personal identifying information pertaining to another person and used that information, or assisted another person in using the information, in order to assume the identity of or represent himself as another person, without that person's authorization and with the purpose to fraudulently obtain or attempt to obtain a benefit or services, that is, the said ANTHONY WOOD, [REDACTED], [REDACTED], and WILLIAM ROMAN obtained the personal identifying information from a financial institution known to the Grand Jurors involving the identities of five or more persons from Boarding Data sheets and used or assisted another person in using the information, without authorization, with the purpose of fraudulently obtaining or attempting to obtain a benefit or services, contrary to the provisions of N.J.S.A. 2C:21-17a(4) and

N.J.S.A. 2C:2-6 and against the peace of this State, the government and dignity of the same.



Gregory A. Paw, Director
Division of Criminal Justice

A TRUE BILL:



Deputy, Foreperson

Dated: 6.13.08

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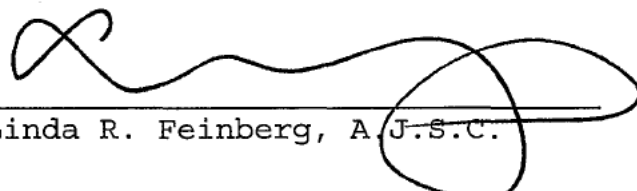
WILLIAM ROMAN)

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 13th day of June, 2008,
pursuant to paragraph 8 of the State Grand Jury Act, that the
County of Burlington 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 Burlington for filing.


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