

FILED

AUG 17 2009

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ576-09-15

Superior Court

Docket Number 09-08-00171-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

CONSTANCE CAMPBELL)

DENISE CAMPBELL)

)

PRISCILLA CAMPBELL)

DENNIS CAMPBELL)

and)

HOLLYANN ALLEN)

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

COUNT ONE

(Official Misconduct - Second Degree)

CONSTANCE CAMPBELL

DENNIS CAMPBELL

HOLLYANNE ALLEN

and


between on or about January 1, 2007 and on or about June 30,

2009, at the Boro of Paulsboro, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court with the purpose of promoting or facilitating the offense, did aid therein, or did commit the offense of Official Misconduct, in that the said CONSTANCE CAMPBELL, 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 CONSTANCE CAMPBELL then and there being a public servant, to wit, an office manager and/or Home Energy Assistance Manager 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 and the said DENISE CAMPBELL, PRISCILLA CAMPBELL, DENNIS CAMPBELL, HOLLYANNE ALLEN, and [REDACTED] in excess of \$200, contrary to the provisions of N.J.S.A. 2C:30-2, 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 TWO

(Theft By Deception - Third Degree)

CONSTANCE CAMPBELL

DENNIS CAMPBELL

HOLLYANN ALLEN

and


between on or about January 1, 2007 through on or about June 30, 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 \$14,595, by deception, 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)

CONSTANCE CAMPBELL

DENNIS CAMPBELL

HOLLYANN ALLEN

[REDACTED]

DENISE CAMPBELL

and

PRISCILLA CAMPBELL

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 January 1, 2007 and on or about June 30, 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: \$24,010 in assistance funds from the New Jersey Department of Community Affairs Home Energy Assistance Program, in a manner which the said CONSTANCE CAMPBELL, DENNIS CAMPBELL, HOLLYANN ALLEN, [REDACTED], DENISE CAMPBELL, and PRISCILLA CAMPBELL knew was unlawful and involved substantial risk of loss or detriment to the owner of the property, thereby deriving a benefit 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)

CONSTANCE CAMPBELL

DENNIS CAMPBELL

HOLLYANN ALLEN

[REDACTED]

DENISE CAMPBELL

and

PRISCILLA CAMPBELL

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 January 1, 2007 and on or about June 30, 2009, at the Boro 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: Official Misconduct, Theft By Deception, 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 CONSTANCE CAMPBELL, DENNIS CAMPBELL, HOLLYANN ALLEN, [REDACTED]
[REDACTED] DENISE CAMPBELL, and PRISCILLA CAMPBELL each accepted checks issued from the New Jersey Department of Community Affairs Home Energy Assistance Program, having a value of approximately \$14,992, which were payable to them and their home heating supplier, which they knew were to be used for the sole purpose of procuring home heating fuel, and subsequently exchanged and cashed these benefit checks through a third party for personal, non-heating benefits, specifically for 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)

CONSTANCE CAMPBELL

DENNIS CAMPBELL

HOLLYANN ALLEN

and


between on or about January 1, 2007 and on or about June 30, 2009, at the Boro of Paulsboro, in the County of Gloucester, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure, did make a false entry in a record, document or thing belonging to, received or kept by, the government for information or record, or required by law to be kept by others for information of the government, that is, the false entries in applications for financial assistance submitted to the New Jersey Department of Community Affairs Home Assistance Program, knowing the entries to be false, contrary to the provisions of N.J.S.A. 2C:28-7(a)(1), 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 SIX

(Falsifying Records - Fourth Degree)

CONSTANCE CAMPBELL

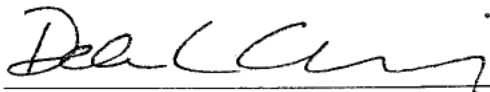
DENNIS CAMPBELL

HOLLYANNE ALLEN

and

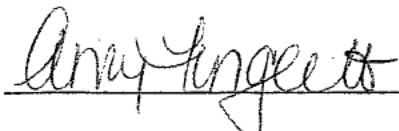
[REDACTED]

between on or about January 1, 2007 through on or about June 30, 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.



Deborah L. Gramiccioni, Director
Division of Criminal Justice

A TRUE BILL:



, Foreperson

Dated: 8/17/09

FILED

AUG 17 2009

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ576-09-15

Superior Court

Docket Number 09-08-00171-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

CONSTANCE CAMPBELL)

DENISE CAMPBELL)

PATSY CAMPBELL)

PRISCILLA CAMPBELL)

DENNIS CAMPBELL)

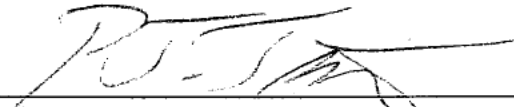
and)

HOLLYANN ALLEN)

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

IT IS ORDERED on this 17th day of August, 2009,
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.


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

PEDRO J. JIMENEZ, JR. J.S.C.