

FILED

JUN 17 2010

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ589-10-10

Superior Court

Docket Number 10-06-00076-S

STATE OF NEW JERSEY

v.

KEVIN COLLINS

INDICTMENT

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

COUNT ONE

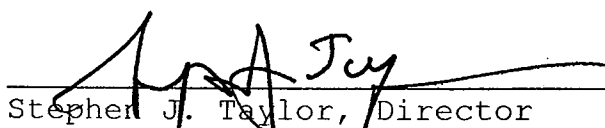
(Impersonation/Theft of Identity - Fourth Degree)

KEVIN COLLINS

between in or about March 2009 and on or about June 2, 2009, at the
Township of Wayne, in the County of Passaic, at the Borough of
Wood-Ridge, in the County of Bergen, elsewhere, and within the
jurisdiction of this Court, did obtain certain personal identifying
information pertaining to another person and did use that
information, or assist another person or persons 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 for himself or another, or to harm or injure another; or

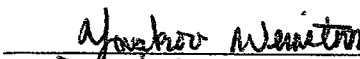
did impersonate another or assume a false identity and did do an act in such assumed character or false identity for the purpose of obtaining a benefit for himself or another or to injure or defraud another; or did pretend to be a representative of some person or organization and did an act in such pretended capacity for the purpose of obtaining a benefit for himself or another or to injure or defraud another; that is, the said KEVIN COLLINS, both individually and through certain innocent or irresponsible person(s) whose conduct he caused and for whose conduct he is legally accountable, while acting as a paid political consultant for two candidates for New Jersey Assembly in a contested Republican primary election in the State's 40th Legislative District, did obtain the cellular telephone number of one of the incumbent Assemblymen's chief of staff and did knowingly provide said cellular telephone number to an automated telephone message or "robocall" provider, knowing that said cellular telephone number would be used in connection with and linked to an automated telephone message or "robocall" which said KEVIN COLLINS knew falsely identified the female caller in the recorded "robocall" by the first name of the said chief of staff, made several disparaging remarks in the message about the incumbent Assemblymen, and encouraged recipients of the call to vote against the incumbent Assemblymen in the June 2, 2009 primary; and did further direct said "robocall" provider to transmit or disseminate, or attempt to

transmit or disseminate, said "robocalls" and the cellular telephone number of the chief of staff to over 12,000 residents of the 40th Legislative District, encompassing portions of Passaic, Bergen, and Essex Counties, in order to make it appear, albeit falsely and without the authorization or permission of said chief of staff, that said "robocalls" originated from said chief of staff, and the cellular telephone number of said chief of staff, or from the campaign organization of, or a representative of, the incumbent Assemblyman on whose staff said chief of staff served, all while acting with the purpose to fraudulently obtain or attempt to obtain a benefit for himself or another, or to harm or injure another, contrary to the provisions of N.J.S.A. 2C:21-17(a)(1), N.J.S.A. 2C:21-17(a)(2), N.J.S.A. 2C:21-17(a)(4), and N.J.S.A. 2C:21-17(c)(1), N.J.S.A. 2C:2-6(a), and N.J.S.A. 2C:2-6(b)(1), and against the peace of this State, the government and dignity of same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Deputy, Foreperson

Dated: June 17, 2010

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STATE OF NEW JERSEY)

v.)

KEVIN COLLINS)

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 17 day of June, 2010,
pursuant to paragraph 8 of the State Grand Jury Act, that the
County of Passaic 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 Passaic for filing.



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