

**FILED**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

DEC 21 2012

State Grand Jury Judge

State Grand Jury

Number SGJ630-12-21

Superior Court

Docket Number 12-12-00228-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

ROBERT G. SCHROEDER, )

ALL POINTS INTERNATIONAL )  
DISTRIBUTORS, INC., )

HERCULES GLOBAL LOGISTICS, )  
LLC, )

RS CONSULTANTS, LLC, )

AND )

RGS BERGEN, LLC. )

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

COUNT ONE

(Issuing a Bad Check - Second Degree)

ROBERT G. SCHROEDER

ALL POINTS INTERNATIONAL DISTRIBUTORS, INC.

HERCULES GLOBAL LOGISTICS, LLC

RS CONSULTANTS, LLC

AND

RGS BERGEN, LLC

between on or about October 26, 2009 and on or about July 27,

2012, in the Borough of Hillsdale, at the County of Bergen, elsewhere, and within the jurisdiction of this Court, knowingly did issue or cause to be issued bad checks drawn on the bank accounts of ALL POINTS INTERNATIONAL DISTRIBUTORS, INCORPORATED, HERCULES GLOBAL LOGISTICS, LLC, RS CONSULTANTS, LLC, and RGS BERGEN, LLC, including, but not limited to, forty-seven bad checks in the amount of \$3,431,150, to wit:

<u>Item #</u>	<u>Check Date</u>	<u>Check #</u>	<u>Account #</u>	<u>Check Amount</u>
1	10/26/09	2630	9002067	\$250,000
2	10/22/10	4101	9002067	\$500,000
3	4/13/11	605	9002067	\$155,000
4	5/4/11	4999	9002067	\$65,000
5	5/23/11	4996	9002067	\$100,000
6	7/5/11	1260	3101010	\$100,000
7	7/22/11	5418	9002067	\$6,000
8	7/25/11	5445	9002067	\$16,100
9	8/16/11	5491	9002067	\$112,000
10	8/24/11	1061	3101304	\$150,000
11	9/2/11	5651	9002067	\$155,000
12	9/2/11	5630	9002067	\$25,000
13	9/2/11	5627	9002067	\$55,000
14	9/2/11	5593	9002067	\$30,000
15	9/2/11	1396	3101010	\$100,000
16	9/9/11	5663	9002067	\$57,000
17	9/9/11	5659	9002067	\$175,000
18	9/27/11	5751	9002067	\$50,000
19	10/31/11	6234	9002067	\$25,000
20	11/1/11	1513	3101010	\$106,000
21	11/2/11	6293	9002067	\$60,000
22	12/2/11	1075	923797013	\$300,000
23	12/2/11	6358	9002067	\$20,000

24	12/19/11	6359	9002067	\$20,000
25	12/22/11	1642	3101010	\$10,000
26	1/31/12	6521	9002067	\$22,500
27	2/15/12	6494	9002067	\$20,000
28	2/21/12	1666	3101304	\$20,000
29	2/21/12	1644	3101304	\$5,000
30	2/23/12	1643	3101304	\$60,000
31	2/23/12	1575	3101304	\$50,000
32	2/23/12	1654	3101304	\$100,000
33	2/23/12	1656	3101304	\$75,000
34	2/23/12	1664	3101304	\$53,000
35	2/24/12	1706	3101304	\$100,000
36	2/28/12	1719	3101304	\$50,000
37	3/1/12	1707	3101304	\$125,000
38	3/8/12	1049	3101592	\$10,000
39	3/9/12	1050	3101592	\$10,000
40	3/9/12	1027	3101592	\$15,000
41	3/21/12	1094	3101592	\$20,000
42	4/27/12	1168	3101592	\$10,000
43	5/1/12	1198	3101592	\$15,000
44	6/20/12	1381	3101592	\$7,500
45	7/2/12	1437	3101592	\$7,550
46	7/9/12	1300	3101592	\$7,000
47	7/27/12	1453	3101592	\$6,500

knowing that the three banks holding the four accounts would not honor said checks, contrary to the provisions of N.J.S.A. 2C:21-5 and N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Second Degree)

ROBERT G. SCHROEDER

ALL POINTS INTERNATIONAL DISTRIBUTORS, INC.

HERCULES GLOBAL LOGISTICS, LLC

RS CONSULTANTS, LLC

AND

RGS BERGEN, LLC

between on or about January 1, 2012 and on or about September 7, 2012, in the Borough of Hillsdale, at the County of Bergen, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another, including, but not limited to, A.B., P.C., G.F., J.L. and M.C., having a value of approximately \$1,887,000, by deception, by creating or reinforcing false impressions that ROBERT G. SCHROEDER would use the loans that they provided to him solely for the purpose of building the Washington Dakota Lodge, also known as the Watford Lodge, housing project in North Dakota,

WHEREAS IN TRUTH AND IN FACT, as the said ROBERT G. SCHROEDER well knew, the loans were used by ROBERT G. SCHROEDER to pay for personal expenses and other debts, not associated with the Washington Dakota Lodge, also known as the Watford Lodge, housing project in North Dakota, contrary to the provisions of N.J.S.A.

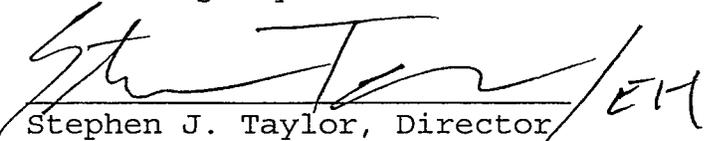
2C:20-4a, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

COUNT THREE

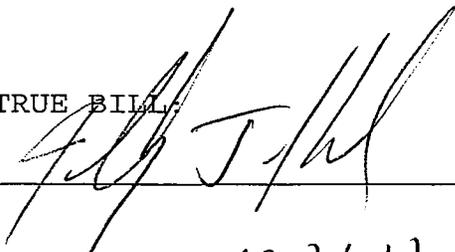
(Misconduct by Corporate Official - Second Degree)

ROBERT G. SCHROEDER

between on or about October 26, 2009 and on or about September 7, 2012, in the Borough of Hillsdale, at the County of Bergen, elsewhere, and within the jurisdiction of this Court, purposely did use, control, or operate a corporation for the furtherance or promotion of a criminal object, thereby deriving a benefit of \$75,000 or more, that is, the said ROBERT G. SCHROEDER, being the owner and operator of ALL POINTS INTERNATIONAL DISTRIBUTORS, INCORPORATED, HERCULES GLOBAL LOGISTICS, LLC, RS CONSULTANTS, LLC, and RGS BERGEN, LLC, did use, control, and operate ALL POINTS INTERNATIONAL DISTRIBUTORS, INCORPORATED, HERCULES GLOBAL LOGISTICS, LLC, RS CONSULTANTS, LLC, and RGS BERGEN, LLC, corporations of the State of New Jersey, for the furtherance or promotion of the criminal objects of Issuing a Bad Check, in violation of N.J.S.A. 2C:21-5, and Theft by Deception, in violation of N.J.S.A. 2C:20-4a, all contrary to the provisions of N.J.S.A. 2C:21-9c, and against the peace of this State, the government and dignity of the same.

  
Stephen J. Taylor, Director  
Division of Criminal Justice

A TRUE BILL

  
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Foreperson

Dated: 12-21-12