

FILED

JAN 15 2019

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ727-19-14

Superior Court

Docket Number 19-01-00002-S

STATE OF NEW JERSEY)

v.)

RICHARD I. LEGEMAH)

and)

NSIMA IDEM)

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

COUNT ONE

(Theft by Deception - Second Degree)

NSIMA IDEM

between in or about April 2016, and in or about May 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another, having a value of \$75,000 or more, by deception; that is, the said NSIMA IDEM did purposely obtain money from a victim whose identity is known to the State Grand Jury, in the approximate amount of \$187,859, by creating or

reinforcing the false impression that he was a vendor of a party affiliated with the victim, which vendor was entitled to such funds for services performed;

WHEREAS IN TRUTH AND IN FACT, as the said NSIMA IDEM there and then well knew, he was not a vendor of a party affiliated with the victim, and was not entitled to such funds, contrary to the provisions of N.J.S.A. 2C:20-4a, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Impersonation - Second Degree)

NSIMA IDEM

between in or about April 2016, and in or about May 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly pretended to be a representative of an 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, and did, in fact, obtain a benefit for himself or another in an amount of \$75,000 or more; that is, the said NSIMA IDEM knowingly pretended to be a representative of an organization whose identity is known to the State Grand Jury and sent electronic communications that led a victim whose identity is known to the State Grand Jury to transfer funds to him or another in the approximate amount of \$187,859, contrary to the provisions of N.J.S.A. 2C:21-17a(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Attempted Theft by Deception - Second Degree)

NSIMA IDEM

on or about May 17, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did an act which, under the circumstances as a reasonable person would believe them to be, was an act constituting a substantial step in a course of conduct planned to culminate in the commission of the crime of Theft by Deception, in an amount of \$75,000 or more; that is, the said NSIMA IDEM caused an electronic mail message to be sent to a party whose identity is known to the State Grand Jury, claiming to be a vendor entitled to a payment of approximately \$98,359 for services performed, which claim was false, as the defendant there and then well knew, contrary to the provisions of N.J.S.A. 2C:5-1a(3), N.J.S.A. 2C:20-4, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Attempted Impersonation - Second Degree)

NSIMA IDEM

on or about May 17, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did an act which, under the circumstances as a reasonable person would believe them to be, was an act constituting a substantial step in a course of conduct planned to culminate in the commission of the crime of Impersonation, in an amount of \$75,000 or more; that is, the said NSIMA IDEM caused an electronic mail message to be sent to a party whose identity is known to the State Grand Jury, pretending to be a vendor entitled to a payment of approximately \$98,359 for services performed, for the purpose of obtaining a benefit for himself or another, or to injure or defraud another, contrary to the provisions of N.J.S.A. 2C:5-1a(3), N.J.S.A. 2C:21-17a(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Financial Facilitation of Criminal Activity - Second Degree)

RICHARD I. LEGEMAH

and

NSIMA IDEM

between on or about May 10, 2016, and on or about May 27, 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did engage in one or more transactions involving property, in an amount of at least \$75,000 but less than \$500,000, known or which a reasonable person would believe to be derived from criminal activity, knowing that each transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity; that is, the said RICHARD I. LEGEMAH and NSIMA IDEM did transfer or direct the transfer of approximately \$155,000 which RICHARD I. LEGEMAH and NSIMA IDEM knew or which a reasonable person would believe to be derived from Theft by Deception or Impersonation, from a bank account maintained by an individual in the State of Texas, whose identity is known to the State Grand Jury, through a separate DMZ Logistics, LLC bank account controlled by RICHARD I. LEGEMAH, and then delivered into various other bank accounts, knowing that these transactions were designed in whole or in part to conceal or disguise the nature, location, source,

ownership or control of the \$155,000 derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(2) (a), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Misconduct by Corporate Official - Second Degree)

RICHARD I. LEGEMAH

and

NSIMA IDEM

between in or about April 2016, and in or about May 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely or knowingly 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 RICHARD I. LEGEMAH and NSIMA IDEM did use, control or operate DMZ Logistics, LLC for the furtherance or promotion of the criminal objects of Conspiracy, in violation of N.J.S.A. 2C:5-2, and Financial Facilitation of Criminal Activity, in violation of N.J.S.A. 2C:21-25b(2)(a), as alleged in Counts Five and Seven, which are re-alleged and incorporated by reference herein, contrary to the provisions of N.J.S.A. 2C:21-9c, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Conspiracy - Second Degree)

RICHARD I. LEGEMAH

and

NSIMA IDEM

between in or about April 2016, and in or about June 2016, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of one or more of the crimes of Misconduct by a Corporate Official, or Financial Facilitation of Criminal Activity, did agree that:

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

B. One or more of them would aid in the planning, attempt, solicitation or commission of one or more of the aforesaid crimes, that is:

1. Financial Facilitation of Criminal Activity, in that they would engage in one or more transactions involving property, in an amount of \$75,000 or more, known or which a reasonable person would believe to be derived from criminal activity, 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, contrary to the provisions of N.J.S.A. 2C:21-25b(2)(a); or

2. Misconduct by a Corporate Official, in that they would purposefully or knowingly use, control or operate a corporation for the furtherance or promotion of a criminal object, thereby deriving a benefit of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:21-9c.

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 EIGHT

(Obstructing Administration of Law or Other Governmental
Function - Fourth Degree)

RICHARD I. LEGEMAH

between on or about August 10, 2017, and on or about August 13, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely obstructed, impaired or perverted the administration of law or other governmental function or prevented or attempted to prevent a public servant from lawfully performing an official function by means of flight, contrary to the provisions of N.J.S.A. 2C:29-1, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Resisting Arrest - Fourth Degree)

RICHARD I. LEGEMAH

between on or about August 10, 2017, and on or about August 13, 2017, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, by flight, purposely prevented or attempted to prevent a law enforcement officer from effecting an arrest, contrary to the provisions of N.J.S.A. 2C:29-2(a)(3), and against the peace of this State, the government and dignity of the same.



Christine Hoffman
Deputy Director
Division of Criminal Justice

A TRUE BILL:

Basant
Foreperson

Date: 1/15/19