

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ770-22-5  
Superior Court  
Docket Number 22-5-58-S

STATE OF NEW JERSEY            )  
  
  v.    )  
  
PHYLLIS DANIEL                            )    INDICTMENT

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

COUNT ONE

(Theft by Deception - Third Degree)

Between on or about May 17, 2017 and on or about July 24, 2019, at Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

purposely did obtain the property of another in an aggregate amount exceeding \$500.00 but less than \$75,000.00 by deception; that is, the said PHYLLIS DANIEL did purposely obtain property from individuals whose initials are B.R., B.G., J.V.-B., and C.M., whose identities are known to the grand jurors, and/or Rushmore Loan Management Services, JPMorgan Chase Bank, N.A., Ocwen Financial Corporation also known as Ocwen Loan Servicing L.L.C., and Wells

Fargo Bank, in an aggregate amount exceeding \$500.00 but less than \$75,000.00 by creating or reinforcing the false impression that Exodus Financial Services, Inc., a company owned by the said PHYLLIS DANIEL, was owed money for insurance policy premiums for the properties of the aforementioned individuals and/or Rushmore Loan Management Services, JPMorgan Chase Bank, N.A., Ocwen Financial Corporation also known as Ocwen Loan Servicing L.L.C., and Wells Fargo Bank; whereas in truth and fact the said PHYLLIS DANIEL well knew that her company was not owed insurance policy premiums for the properties of the aforementioned individuals and/or Rushmore Loan Management Services, JPMorgan Chase Bank, N.A., Ocwen Financial Corporation also known as Ocwen Loan Servicing L.L.C., and Wells Fargo Bank; contrary to the provisions of N.J.S.A. 2C:20-4a, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Attempted Theft by Deception - Third Degree)

Between on or about October 17, 2017 and on or about October 24, 2017, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

purposely did attempt to obtain the property of another in an aggregate amount exceeding \$500.00 but less than \$75,000.00 by deception; that is, the said PHYLLIS DANIEL did purposely attempt to obtain property from an individual whose initials are M.J.T., whose identity is known to the grand jurors and/or Ocwen Financial Corporation also known as Ocwen Loan Servicing L.L.C., in an amount exceeding \$500.00 but less than \$75,000.00, by creating or reinforcing the false impression that Exodus Financial Services, Inc., a company owned by the said PHYLLIS DANIEL, was owed money for insurance policy premiums for the property of M.J.T. and/or Ocwen Financial Corporation also known as Ocwen Loan Servicing L.L.C.; whereas in truth and fact the said PHYLLIS DANIEL well knew that her company was not owed insurance policy premium funds for the property of M.J.T. and/or Ocwen Financial Corporation also known as Ocwen Loan Servicing L.L.C.;

contrary to the provisions of N.J.S.A. 2C:20-4a, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Misconduct by Corporate Official - Third Degree)

Between on or about May 17, 2017 and on or about August 16, 2018, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

purposely or knowingly did use, control or operate a corporation for the furtherance or promotion of any criminal object, thereby deriving a benefit in an amount exceeding \$1,000.00 but less than \$75,000.00, that is, the said PHYLLIS DANIEL did use, control or operate Exodus Financial Services Incorporated, a former corporation of the State of New Jersey, for the furtherance or promotion of the criminal object of theft by deception, in violation of N.J.S.A. 2C:20-4a, thereby deriving a benefit in an amount exceeding \$1,000.00 but less than \$75,000.00, 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.

COUNT FOUR

(Falsifying Records - Fourth Degree)

On or about July 25, 2017, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

did falsify any writing or record, or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure an individual whose initials are B.G., whose identity is known to the grand jurors, and/or Rushmore Loan Management Services that is, the said PHYLLIS DANIEL did falsify or utter an evidence of property insurance record and/or a fax cover letter to obtain payment for insurance policy premiums knowing the document or documents contained false information, with the purpose to injure B.G. and/or Rushmore Loan Management Services,

contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Falsifying Records - Fourth Degree)

On or about July 2, 2018, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

did falsify any writing or record, or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure an individual whose initials are B.G., whose identity is known to the grand jurors, and/or Rushmore Loan Management Services that is, the said PHYLLIS DANIEL did falsify or utter an evidence of property insurance record and/or a fax cover letter to obtain payment for insurance policy premiums knowing the document or documents contained false information, with the purpose to injure B.G. and/or Rushmore Loan Management Services,

contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Falsifying Records - Fourth Degree)

Between on or about May 1, 2017 and/or on or about August 18, 2017, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

did falsify any writing or record, or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure an individual whose initials are B.R, whose identity is known to the grand jurors, and/or Ocwen Financial Corporations also known as Ocwen Loan Servicing, L.L.C., that is, the said PHYLLIS DANIEL did falsify or utter an evidence of property insurance record and/or a fax cover letter to obtain payment for insurance policy premiums knowing the document or documents contained false information, with the purpose to injure B.R. and/or Ocwen Financial Corporations also known as Ocwen Loan Servicing, L.L.C.,

contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Falsifying Records - Fourth Degree)

On or about October 26, 2017, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

did falsify any writing or record, or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure an individual whose initials are C.M., whose identity is known to the grand jurors, and/or JPMorgan Chase Bank, N.A., that is, the said PHYLLIS DANIEL did falsify or utter a document appearing to be a policy declaration and/or a fax cover letter to obtain payment for insurance policy premiums knowing the document or documents contained false information, with the purpose to injure C.M. and/or JPMorgan Chase Bank, N.A., contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.



COUNT EIGHT

(Falsifying Records - Fourth Degree)

On or about October 13, 2018, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

did falsify any writing or record, or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure an individual whose initials are C.M., whose identity is known to the grand jurors, and/or JPMorgan Chase Bank, N.A., that is, the said PHYLLIS DANIEL did falsify or utter a document appearing to be a policy declaration and/or a fax cover letter to obtain payment for insurance policy premiums knowing the document or documents contained false information, with the purpose to injure C.M. and/or JPMorgan Chase Bank, N.A., contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Falsifying Records - Fourth Degree)

On or about October 29, 2019, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

did falsify any writing or record or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure an individual whose initials are C.M., whose identity is known to the grand jurors, and/or JPMorgan Chase Bank, N.A., that is, the said PHYLLIS DANIEL did falsify or utter a document appearing to be a notice of cancellation and/or a fax cover letter to obtain payment for insurance policy premiums knowing the document or documents contained false information, with the purpose to injure C.M. and/or JPMorgan Chase Bank, N.A., contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Falsifying Records - Fourth Degree)

On or about November 27, 2017, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

did falsify any writing or record, or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure an individual whose initials are J. V.-B., whose identity is known to the grand jurors, and/or Wells Fargo Bank, that is, the said PHYLLIS DANIEL did falsify or utter an evidence of property insurance record and/or a fax cover letter to obtain payment for insurance policy premiums knowing the document or documents contained false information, with the purpose to injure J. V.-B. and/or Wells Fargo Bank, contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.


COUNT ELEVEN

(Falsifying Records - Fourth Degree)

On or about October 19, 2018, at the Town of Oak Ridge, in the County of Morris, and elsewhere, all within the jurisdiction of this Court,

**PHYLLIS DANIEL**

did falsify any writing or record, or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure an individual whose initials are J. V.-B., whose identity is known to the grand jurors, and/or Wells Fargo Bank, that is, the said PHYLLIS DANIEL did falsify or utter an evidence of property insurance record and/or a fax cover letter to obtain payment for insurance policy premiums knowing the document or documents contained false information, with the purpose to injure J. V.-B. and/or Wells Fargo Bank, contrary to the provisions of N.J.S.A. 2C:21-4a, and against the peace of this State, the government and dignity of the same.



Tracy M. Thompson  
Insurance Fraud Prosecutor  
Division of Criminal Justice  
Office of the Insurance Fraud Prosecutor

A TRUE BILL:

  
Foreperson

Dated: 5/10/22