

AUGUST 25, 2022

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ777-22-1
Superior Court
Docket Number 22-8-105-S

STATE OF NEW JERSEY)

v.)

DANIEL CASSELL)

BINDU CASSELL)

CARMEN WARD)

KNYCKHOLLE HOOKE)

JOHN JOHNSON)

INDICTMENT

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

COUNT ONE

(Financial Facilitation of Criminal Activity - First Degree)

DANIEL CASSELL

between on or about May 22, 2018, and on or about June 23, 2021, at the Borough of New Providence, in the County of Union, elsewhere, and within the jurisdiction of this Court, did: (1) engage in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity with the intent to facilitate or promote the criminal activity; and/or (2) engage in a transaction involving property known or which a reasonable person would believe to be derived

from criminal activity knowing that the transaction is designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity; and/or (3) direct, organize, finance, plan, manage, supervise, or control the transportation of or transactions in property known or which a reasonable person would believe to be derived from criminal activity, in an amount greater than \$500,000, contrary to the provisions of N.J.S.A. 2C:21-25b(1), 2C:21-25b(2)(a), 2C:21-25c, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Conspiracy - Second Degree)

DANIEL CASSELL

CARMEN WARD

and

KNYCKHOLLE HOOKE

between on or about March 13, 2017, and on or about October 28, 2020, at the Borough of New Providence, in the County of Union, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of Health Care Claims Fraud, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crime, or

B. One or more of them knowingly would aid in the planning, solicitation, or commission of said crime, that is:

1. Knowingly make or cause to be made, five or more false, fictitious, fraudulent, or misleading statements of material fact in, or knowingly did omit five or more material facts from, or knowingly did cause five or more material facts to be omitted from, any record, bill, claim, or other document, in writing, electronically or in any other form, that they did attempt to submit, submit, caused to be submitted, or attempted to cause to be submitted for payment or reimbursement for health care services,

where the aggregate pecuniary benefit obtained or sought to be obtained was greater than \$1,000, contrary to the provisions of N.J.S.A. 2C:21-4.3c;

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Health Care Claims Fraud - Second Degree)

DANIEL CASSELL

and

KNYCKHOLLE HOOKE

between on or about January 2, 2015, and on or about October 28, 2020, at the Borough of New Providence, in the County of Union, elsewhere, and within the jurisdiction of this Court, did knowingly make or cause to be made, a false, fictitious, fraudulent, or misleading statement of material fact in, or knowingly did omit a material fact from, or knowingly did cause a material fact to be omitted from, any record, bill, claim, or other document, in writing, electronically or in any other form, that they did attempt to submit, submit, caused to be submitted, or attempted to cause to be submitted for payment or reimbursement for health care services; that is, they knowingly presented five or more fraudulent claims to Medicaid for services not rendered to numerous Medicaid beneficiaries, which claims served to justify reimbursement for health care services to obtain a pecuniary benefit of more than \$1,000, contrary to the provisions of N.J.S.A. 2C:21-4.3c, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Health Care Claims Fraud - Second Degree)

CARMEN WARD

between on or about January 2, 2015, and on or about October 28, 2020, at the Borough of New Providence, in the County of Union, elsewhere, and within the jurisdiction of this Court, as a practitioner, licensed in this State to practice professional counseling, in the course of providing professional services, knowingly did make, or cause to be made, a false, fictitious, fraudulent, or misleading statement of material fact in, or knowingly did omit a material fact from, or knowingly did cause a material fact to be omitted from, any record, bill, claim or other document, in writing, electronically or in any other form, that she did attempt to submit, submit, or cause to be submitted, or attempted to cause to be submitted for payment or reimbursement for health care services purportedly provided to numerous Medicaid beneficiaries, contrary to the provisions of N.J.S.A. 2C:21-4.3a, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Conspiracy - Third Degree)

DANIEL CASSELL

CARMEN WARD

and

KNYCKHOLLE HOOKE

between on or about March 13, 2017, and on or about October 28, 2020, at the Borough of New Providence, in the County of Union, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Medicaid Fraud, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

B. One or more of them knowingly would aid in the planning, solicitation, or commission of said crimes, that is:

1. Willfully obtains benefits under P.L.1968, c.413 (C.30:4D-1 et seq.) to which a person is not entitled or in a greater amount than that to which a person is entitled and any provider who willfully receives medical assistance payments to which a provider is not entitled or in a greater amount than that to which a provider is entitled, contrary to the provisions of N.J.S.A. 30:4D-17a.

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following OVERT ACTS, among others, were committed:

1. Between on or about January 2, 2015, and on or about October 28, 2020, Kwenyan Enterprise employees **Daniel Cassell, Carmen Ward** and **Knyckholle Hooke** submitted or caused to be submitted thousands of false claims to Medicaid for reimbursement;
2. During that time period, **Daniel Cassell** engaged in the practice of "blanket billing" for services using a master list of clients as opposed to reviewing Daily Attendance Lists (DALs) to determine the actual service the clients received and then billing specifically and accordingly;
3. On or about some time in 2018, **Daniel Cassell** hired and staffed the Kwenyan Entities' billing department. First, he hired Sheila Ebiaru as Billing Manager. He directed her to engage in fraudulent billing practices. He also had her train **Knyckholle Hooke** to continue those various fraudulent billing practices;
4. **Carmen Ward** generated Daily Attendance Lists (DALs) that falsely listed the presence of clients who never appeared for service. The Kwenyan Entities' billing department used these DALs to bill Medicaid, though no services were provided to clients.
5. **Daniel Cassell** terminated Ebiaru for failing to bill Medicaid for missed appointments. Afterwards, **Knyckholle Hooke** was appointed to Ebiaru's position and resumed the fraudulent billing practices, while **Carmen Ward** continued to falsify DALs to Ebiaru and **Hooke**;
6. **Daniel Cassell** was ultimately responsible for the submission of thousands of false claims to Medicaid. A portion of those false claims were attributed to **Carmen Ward's** false DALs and **Knyckholle Hooke's** false billing. The remaining portion of those thousands of total false claims were for services never rendered to clients or

where group services were performed but individual or family psychotherapy services were billed. **Daniel Cassell** was ultimately responsible for all false claims. **Carmen Ward** and **Knyckholle Hooke** each provided false information as a basis for a portion of said claims.

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Medicaid Fraud - Third Degree)

DANIEL CASSELL

CARMEN WARD

and

KNYCKHOLLE HOOKE

between on or about January 2, 2015, and on or about October 28, 2020, at the Borough of New Providence, in the County of Union, elsewhere, and within the jurisdiction of this Court, willfully did obtain medical assistance payments under New Jersey Medical Assistance and Health Services Act, N.J.S.A. 30:4D-1 et seq. to which the defendants were not entitled or in a greater amount than that to which defendants were entitled, that is, DANIEL CASSELL, CARMEN WARD and KNYCKHOLLE HOOKE knowingly and willfully did receive medical assistance payments based upon claims containing false representations caused to be submitted to the New Jersey Medical Assistance and Health Services Program by the defendants, contrary to the provisions of N.J.S.A. 30:4D-17(a), and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Medicaid Fraud - Third Degree)

DANIEL CASSELL

CARMEN WARD

and

KNYCKHOLLE HOOKE

between on or about January 2, 2015, and on or about October 28, 2020, at the Borough of New Providence, in the County of Union, and within the jurisdiction of this Court, acting with an intent to fraudulently secure payments not authorized under the New Jersey Medical Assistance and Health Services Act, N.J.S.A. 30:4D-1 et seq., and payments in a greater amount than that which is authorized under the said Act, knowingly and willfully did make or cause to be made false statements and representations of material facts in documents necessary to apply for and receive medical assistance payments under the Act, that is, DANIEL CASSELL, CARMEN WARD and KNYCKHOLLE HOOKE, did cause to be submitted to the New Jersey Medical Assistance and Health Services Program, over 10,000 false claims where no actual services were rendered or where group therapy services were performed but higher paying individual therapy or family psychotherapy codes were falsely billed, contrary to the provisions of N.J.S.A. 30:4D-17(b), and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Theft by Deception - Second Degree)

DANIEL CASSELL

between on or about January 2, 2015, and on or about October 28, 2020, at the Borough of New Providence, in the County of Union, and within the jurisdiction of this Court, purposely did obtain in excess of \$75,000 from Medicaid, by deception, that is, by creating or reinforcing the false impression that Kwenyan Professional Health Services and Kwenyan and Associates properly billed for services actually rendered when those entities submitted over 10,000 false claims, contrary to the provisions of N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Failure to Pay Tax - Third Degree)

DANIEL CASSELL

and

BINDU CASSELL

on or about September 6, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to pay or turn over when due any tax, fee, penalty or interest or any part thereof required to be paid pursuant to the provisions of the state tax uniform procedure law, r.s. 54:48-1 et seq., as amended and supplemented, or any state tax law, with the intent to evade, avoid or otherwise not make timely payment or deposit of any tax, fee, penalty or interest or any part thereof. that is, DANIEL CASSELL and BINDU CASSELL, did fail to pay required state income tax on income earned from New Jersey sources during the 2016 tax year, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this state, the government and dignity of the same.

COUNT TEN

(Failure to Pay Tax - Third Degree)

DANIEL CASSELL

and

BINDU CASSELL

on or about May 24, 2018, at the at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to pay or turn over when due any tax, fee, penalty or interest or any part thereof required to be paid pursuant to the provisions of the state tax uniform procedure law, r.s. 54:48-1 et seq., as amended and supplemented, or any state tax law, with the intent to evade, avoid or otherwise not make timely payment or deposit of any tax, fee, penalty or interest or any part thereof. that is, DANIEL CASSELL and BINDU CASSELL, did fail to pay required state income tax on income earned from New Jersey sources during the 2017 tax year, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this state, the government and dignity of the same.

COUNT ELEVEN

(Failure to Pay Tax - Third Degree)

DANIEL CASSELL

and

BINDU CASSELL

on or about May 14, 2019, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to pay or turn over when due any tax, fee, penalty or interest or any part thereof required to be paid pursuant to the provisions of the state tax uniform procedure law, r.s. 54:48-1 et seq., as amended and supplemented, or any state tax law, with the intent to evade, avoid or otherwise not make timely payment or deposit of any tax, fee, penalty or interest or any part thereof. that is, DANIEL CASSELL and BINDU CASSELL, did fail to pay required state income tax on income earned from New Jersey sources during the 2018 tax year, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this state, the government and dignity of the same.

COUNT TWELVE

(Filing Fraudulent Return - Third Degree)

DANIEL CASSELL

and

BINDU CASSELL

on or about September 6, 2017, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did file, prepare, cause to be filed or assisted in the preparation or filing of a false or fraudulent return, report, statement or application required to be filed pursuant to the provisions of the state tax uniform procedure law, r.s. 54:48-1 et seq., as amended and supplemented, or any state tax law, with the intent to evade, avoid or otherwise not make timely payment of any tax, fee, penalty or interest, or any part thereof; that is, DANIEL CASSELL and BINDU CASSELL did jointly file a New Jersey non-resident income tax return, which falsely omitted required New Jersey sourced income earned during the 2016 tax year, contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this state, the government and dignity of the same.

COUNT THIRTEEN

(Filing Fraudulent Return - Third Degree)

DANIEL CASSELL

and

BINDU CASSELL

on or about May 24, 2018, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did file, prepare, cause to be filed or assisted in the preparation or filing of a false or fraudulent return, report, statement or application required to be filed pursuant to the provisions of the state tax uniform procedure law, r.s. 54:48-1 et seq., as amended and supplemented, or any state tax law, with the intent to evade, avoid or otherwise not make timely payment of any tax, fee, penalty or interest, or any part thereof; that is, DANIEL CASSELL and BINDU CASSELL did jointly file a New Jersey non-resident income tax return, which falsely omitted required New Jersey sourced income earned during the 2017 tax year, contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this state, the government and dignity of the same.

COUNT FOURTEEN

(Filing Fraudulent Return - Third Degree)

DANIEL CASSELL

and

BINDU CASSELL

between on or about May 14, 2019, at the Borough of New Providence, in the County of Union, elsewhere, and within the jurisdiction of this Court, did file, prepare, cause to be filed or assisted in the preparation or filing of a false or fraudulent return, report, statement or application required to be filed pursuant to the provisions of the state tax uniform procedure law, r.s. 54:48-1 et seq., as amended and supplemented, or any state tax law, with the intent to evade, avoid or otherwise not make timely payment of any tax, fee, penalty or interest, or any part thereof. that is, DANIEL CASSELL and BINDU CASSELL did jointly file a New Jersey non-resident income tax return, which falsely omitted required New Jersey sourced income earned during the 2018 tax year, contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this state, the government and dignity of the same.

COUNT FIFTEEN

(Misconduct by a Corporate Official - Second Degree)

DANIEL CASSELL

and

BINDU CASSELL

between on or about September 6, 2017, and on or about May 14, 2019, at the Borough of New Providence, in the County of Union, 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 the benefit of more than \$75,000, that is, DANIEL CASSELL, being the President / Chief Executive Officer and BINDU CASSELL, being a Manager on the list of company officers contained within corporate formation documents, did use, control or operate Kwenyan Professional Health Services and / or Kwenyan and Associates, a corporation of the state of New Jersey, for the furtherance or promotion of the criminal object of failure to pay tax, in violation of N.J.S.A. 54:52-9; and filing a fraudulent return, in violation of N.J.S.A. 54:52-10; 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 SIXTEEN

(Conspiracy - Second Degree)

DANIEL CASSELL

and

JOHN JOHNSON

between on or about August 1, 2019, and on or about September 30, 2020, at the Borough of New Providence, in the County of Union, elsewhere, and within the jurisdiction of this Court, purposely or with the purpose of promoting or facilitating the commission of the crimes of Insurance Fraud, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

B. One or more of them knowingly would aid in the planning, solicitation, or commission of said crimes, that is:

1. Knowingly did operate several motor vehicles principally garaged in this State on the public highways of this State, but said motor vehicles are insured by policies issued under the laws of another state; specifically, defendants knowingly prepared or made written, electronic or oral statements indicating that the vehicles were to be principally garaged in Pennsylvania, which resulted in Progressive Insurance Company's issuance of Pennsylvania Motor Vehicle insurance policies for the defendants' fleet of 20 Kwenyan Professional Health Service vans listed below,

where the aggregate pecuniary benefit obtained or sought to be obtained was greater than \$1,000,

VIN	MODEL YEAR	MAKE	MODEL	ACTUAL GARAGE ADDRESS	ACTUAL POLICY #	COVERAGE DATES
1GJZ7NFF1G1198564	2016	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJZ7PFFOH1115560	2017	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJW7EFFXG1327243	2016	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJZ7PFGXH1142015	2017	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04212050-0	10/17/2017-10/17/2018
1GAZGYFA9D1156449	2013	Chevrolet	Express	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJW7EFFXG1228406	2016	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GAZGYFG8F1113731	2015	Chevrolet	Express	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJW7EFF4G1205915	2016	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7NFF4H1107837	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7NFF8G1309983	2016	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7NFF7H1340501	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7PFF8H1116178	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04217034-1	10/19/2018-10/19/2019
1GJZ7NFF6G1208005	2016	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7PFFOH1305696	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7PFG4G1211392	2016	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GAZG1FA6E1208452	2014	Chevrolet	Express	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7NFGXH1126854	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04217034-1	10/19/2018-10/19/2019
1GJZ7NFGXK1279323	2019	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04217034-1	10/19/2018-10/19/2019
1GJZ7NFF2H1141758	2017	GMC	Savana	200 Main St., Flemington, NJ 08822	04212050-0	10/17/2017-10/17/2018
1GJZ7NFG7J1177055	2018	GMC	Savana	200 Main St., Flemington, NJ 08822	04212050-0	10/17/2017-10/17/2018
1GJZ7NFFXH1143516	2017	GMC	Savana	200 Main St., Flemington, NJ 08822	04212050-0	10/17/2017-10/17/2018
1GJZ7NFF0H1340940	2017	GMC	Savana	291 Pickford Ave., Phillipsburg, NJ 08865	04212050-0	10/17/2017-10/17/2018
1GJZ7NFG1K1324827	2019	GMC	Savana	291 Pickford Ave., Phillipsburg, NJ 08865	04217034-1	10/19/2018-10/19/2019
1GJZ7NFG2K1278456	2019	GMC	Savana	291 Pickford Ave., Phillipsburg, NJ 08865	04217034-1	10/19/2018-10/19/2019
1GJZ7NFGXK1279029	2019	GMC	Savana	200 South Street, New Providence, NJ 07971	04217034-1	10/19/2018-10/19/2019

contrary to the provisions of N.J.S.A. 2C:21-4.6b and N.J.S.A. 2C:21-4.6c;

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Insurance Fraud - Second Degree)

DANIEL CASSELL

and

JOHN JOHNSON

between on or about October 1, 2017, and on or about September 30, 2020, at the Borough of New Providence, in the County of Union, elsewhere, and within the jurisdiction of this Court, did operate several motor vehicles principally garaged in this State on the public highways of this State, but said motor vehicles are insured by policies issued under the laws of another state; specifically, defendants knowingly prepared or made written, electronic or oral statements indicating that the vehicles were to be principally garaged in Pennsylvania, which resulted in Progressive Insurance Company's issuance of Pennsylvania Motor Vehicle insurance policies for the defendants' fleet of 20 Kwenyan Professional Health Service vans listed below, where the aggregate pecuniary benefit obtained or sought to be obtained was greater than \$1,000,

VIN	MODEL YEAR	MAKE	MODEL	ACTUAL GARAGE ADDRESS	ACTUAL POLICY #	COVERAGE DATES
1GJZ7NFF1G1198564	2016	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJZ7PFFOH1115560	2017	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJW7EFFXG1327243	2016	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJZ7PFGXH1142015	2017	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04212050-0	10/17/2017-10/17/2018
1GAZGYFA9D1156449	2013	Chevrolet	Express	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJW7EFFXG1228406	2016	GMC	Savana	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GAZGYFG8F1113731	2015	Chevrolet	Express	19 Hutton Ave, West Orange, NJ 07052	04217034-1	10/19/2018-10/19/2019
1GJW7EFF4G1205915	2016	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7NFF4H1107837	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7NFF8G1309983	2016	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7NFF7H1340501	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7PFF8H1116178	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04217034-1	10/19/2018-10/19/2019
1GJZ7NFF6G1208005	2016	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7PFFOH1305696	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7PFG4G1211392	2016	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GAZG1FA6E1208452	2014	Chevrolet	Express	860 Lower Ferry Road, Ewing, NJ 08628	04212050-0	10/17/2017-10/17/2018
1GJZ7NFGXH1126854	2017	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04217034-1	10/19/2018-10/19/2019
1GJZ7NFGXK1279323	2019	GMC	Savana	860 Lower Ferry Road, Ewing, NJ 08628	04217034-1	10/19/2018-10/19/2019
1GJZ7NFF2H1141758	2017	GMC	Savana	200 Main St., Flemington, NJ 08822	04212050-0	10/17/2017-10/17/2018
1GJZ7NFG7J1177055	2018	GMC	Savana	200 Main St., Flemington, NJ 08822	04212050-0	10/17/2017-10/17/2018
1GJZ7NFFXH1143516	2017	GMC	Savana	200 Main St., Flemington, NJ 08822	04212050-0	10/17/2017-10/17/2018
1GJZ7NFF0H1340940	2017	GMC	Savana	291 Pickford Ave., Phillipsburg, NJ 08865	04212050-0	10/17/2017-10/17/2018
1GJZ7NFG1K1324827	2019	GMC	Savana	291 Pickford Ave., Phillipsburg, NJ 08865	04217034-1	10/19/2018-10/19/2019
1GJZ7NFG2K1278456	2019	GMC	Savana	291 Pickford Ave., Phillipsburg, NJ 08865	04217034-1	10/19/2018-10/19/2019
1GJZ7NFGXK1279029	2019	GMC	Savana	200 South Street, New Providence, NJ 07971	04217034-1	10/19/2018-10/19/2019

contrary to the provisions of N.J.S.A. 2C:21-4.6b and N.J.S.A. 2C:21-4.6c, 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: 8/25/22