FILED

FEBRUARY 3, 2022

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury Number SGJ767-22-5 Superior Court

Docket Number 22-2-17-S

STATE OF NEW JERSEY)

> INDICTMENT) V.

MARGARET MARTIN

and)

MARY GRACE LUMOR)

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

COUNT ONE

(Reckless Manslaughter - Second Degree)

MARGARET MARTIN

on or about July 28, 2017, at the City of Absecon, in the County of Atlantic, elsewhere and within the jurisdiction of this Court, did commit manslaughter by recklessly causing the death of K.M., contrary to the provisions of N.J.S.A. 2C:11-4b(1), and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Destruction, Falsification or Alteration of

Records Relating to Medical Care - Fourth Degree)

MARY GRACE LUMOR

between on or about July 28, 2017, and on or about July 29, 2017, at

the City of Absecon, in the County of Atlantic, elsewhere and within

the jurisdiction of this Court, purposely did destroy, alter, or

falsify a record relating to the care of a medical, surgical, or

podiatric patient in order to deceive or mislead Absecon Manor Nursing

and Rehabilitation Center and/or patient K.M., as to information,

including but not limited to, a diagnosis, test, medication, treatment

or medical or psychological history concerning the patient, contrary

to the provisions of $\underline{\text{N.J.S.A.}}$ 2C:21-4.1 and against the peace of this

State, the government and dignity of the same.

Tracy M. Thompson

Insurance Fraud Prosecutor

N.J. Division of Criminal Justice

Office of the Insurance Fraud Prosecutor

A TRUE BILL:

s/

, Foreperson

Dated:

2/3/22