

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 )  
 )  
 v. ) INDICTMENT  
 )  
 MARGARET MARTIN )  
 )  
 and )  
 )  
 )

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

COUNT ONE

(Reckless Manslaughter - Second Degree)

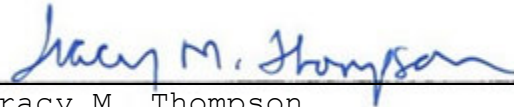
**MARGARET MARTIN**

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)

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 N.J.S.A. 2C:21-4.1 and against the peace of this State, the government and dignity of the same.



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

A TRUE BILL:

s/ [REDACTED]  
, Foreperson

Dated: 2/3/22