

MAY 12, 2022

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury  
Number SGJ772-2-1  
Superior Court  
Docket Number 22-5-60-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

HASSANAH TODD )

And )

SHIRELL TODD )

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

**COUNT ONE**

**(CONSPIRACY - SECOND DEGREE)**

On various dates between on or about June 1, 2017 and July 13, 2019, at the City of Newark, in the County of Essex, and elsewhere, and all within the jurisdiction of this Court,

**HASSANAH TODD**

**AND**

**SHIRELL TODD**

did, with the purpose of promoting or facilitating the commission of Insurance Fraud, Falsifying or Tampering with Records, and Theft by Deception agree that:

(a) One or more of them would knowingly engage in conduct, which constitutes the aforementioned crimes, or an attempt or solicitation to commit such crimes; or

(b) One or more of them would knowingly aid such other person or persons in the planning or commission of the aforementioned crimes, or of an attempt or solicitation to commit such crimes, that is,

1. Insurance Fraud, in violation of N.J.S.A. 2C:21-4.6a(1) and N.J.S.A. 2C:21-4.6c;
2. Falsifying or Tampering with Records, in violation of N.J.S.A. 2C:21-4a; and
3. Theft by Deception, in violation of N.J.S.A. 2C:20-4a and N.J.S.A. 2C:20-2b(2) (a)

and among the means by which the aforesaid defendants would carry out the conspiracy was submitting or causing to be submitted claims forms and medical records for benefits to Aflac, which benefits neither defendant was entitled to because the forms and records falsely claimed that the defendants received medical treatment or services on certain dates when, in fact, the said **HASSANAH TODD** and **SHIRELL TODD** well knew that they did not receive the medical treatment or services alleged on the dates alleged, all contrary to the provisions of N.J.S.A. 2C:5-2a; N.J.S.A. 2C:5-4a; N.J.S.A. 2C:21-4.6a(1); N.J.S.A. 2C:21-4.6c; N.J.S.A. 2C:21-4a; N.J.S.A. 2C:20-4a; and N.J.S.A.

2C:20-2b(2) (a), and against the peace of this State, the government and dignity of the same.

**COUNT TWO**

**(INSURANCE FRAUD - SECOND DEGREE)**

On various dates between on or about June 1, 2017 and July 13, 2019, at the City of Newark, in the County of Essex, and elsewhere, all within the jurisdiction of this Court,

**HASSANAH TODD**

did commit insurance fraud by knowingly committing five or more acts of insurance fraud with the aggregate value of property, services, or other benefit wrongfully obtained or sought to be obtained being at least \$1,000.00; that is, the said **HASSANAH TODD** did knowingly make, or cause to be made five or more false, fictitious, fraudulent, or misleading statements of material fact in, or knowingly did omit or cause to be omitted material facts from any records, bills, claims, or other documents, in writing, electronically, orally, or in any other form, that the said **HASSANAH TODD** did attempt to submit, submitted, caused to be submitted, or did attempt to cause to be submitted as part of, in support of or opposition to or in connection with claims for payment, reimbursement, or other benefit pursuant to an insurance policy or from an insurance company, and the aggregate value of the property, services, or benefits the said **HASSANAH TODD** wrongfully obtained or sought to obtain was at least \$1,000.00; specifically, the said **HASSANAH TODD** knowingly made, or caused to be made at least five false, fictitious,

fraudulent, or misleading statements of material fact as part of, in support of, or in connection with a claim for payment, reimbursement, or other benefit made to Aflac pursuant to health insurance policy ending in X2A1, contrary to the provisions of N.J.S.A. 2C:21-4.6a(1) and N.J.S.A. 2C:21-4.6c, and against the peace of this State, the government and dignity of the same.

**COUNT THREE**

**(THEFT BY DECEPTION - THIRD DEGREE)**

On various dates between on or about June 1, 2017 and August 7, 2018, at the City of Newark, in the County of Essex, and elsewhere, all within the jurisdiction of this Court,

**HASSANAH TODD**

did purposely obtain the property of another in an aggregate amount exceeding \$500.00 but less than \$75,000.00 by deception; that is, the said **HASSANAH TODD** did purposely obtain property from Aflac pursuant to the policy ending in X2A1 in an aggregate amount exceeding \$500.00 but less than \$75,000.00 by creating or reinforcing the false impression that the said **HASSANAH TODD** had received medical treatment or services from medical providers; whereas in truth and fact, the said **HASSANAH TODD** well knew that the said **HASSANAH TODD** had not received the medical treatment or services from the medical providers alleged on the dates alleged and was not entitled to any payment, reimbursement, or other benefit from Aflac, contrary to the provisions of N.J.S.A. 2C:20-4a and N.J.S.A. 2C:20-2b(2) (a), and against the peace of this State, the government and dignity of the same.

**COUNTS FOUR & FIVE**

**(FALSIFYING OR TAMPERING WITH RECORDS - FOURTH DEGREE)**

On various dates between on or about August 1, 2018 and October 2, 2018, at the City of Newark, in the County of Essex, and elsewhere, all within the jurisdiction of this Court,

**HASSANAH TODD**

did falsify or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure anyone or to conceal any wrongdoing; that is, the said **HASSANAH TODD** falsified or uttered records to Aflac, as outlined in the following chart, knowing that the records contained a false statement or information; that is, the records falsely indicated that the said **HASSANAH TODD** received medical treatment or services from medical providers, whereas, in truth and in fact, the said **HASSANAH TODD** well knew that she had not received the medical treatment or services from medical providers on the dates alleged, and the said **HASSANAH TODD** acted with purpose to deceive Aflac into paying her under the policy ending in X2A1, as follows:

<b>Count</b>	<b>Claim Number (Ending 4 Digits)</b>	<b>Date of Submission</b>
Four	0214 9587	August 1, 2018 August 2, 2018
Five	5396	October 2, 2018

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**

**(INSURANCE FRAUD - SECOND DEGREE)**

On various dates between on or about November 15, 2017 and November 2, 2018, at the City of Newark, in the County of Essex, and elsewhere, all within the jurisdiction of this Court,

**SHIRELL TODD**

did commit insurance fraud by knowingly committing five or more acts of insurance fraud with the aggregate value of property, services, or other benefit wrongfully obtained or sought to be obtained being at least \$1,000.00; that is, the said **SHIRELL TODD** did knowingly make, or cause to be made five or more false, fictitious, fraudulent, or misleading statements of material fact in, or knowingly did omit or cause to be omitted material facts from any records, bills, claims, or other documents, in writing, electronically, orally, or in any other form, that the said **SHIRELL TODD** did attempt to submit, submitted, caused to be submitted, or did attempt to cause to be submitted as part of, in support of or opposition to or in connection with claims for payment, reimbursement, or other benefit pursuant to an insurance policy or from an insurance company, and the aggregate value of the property, services, or benefits the said **SHIRELL TODD** wrongfully obtained or sought to obtain was at least \$1,000.00 ; specifically, the said **SHIRELL TODD** knowingly made, or caused to be made at least five false, fictitious,

fraudulent, or misleading statements of material fact as part of, in support of, or in connection with a claim for payment, reimbursement, or other benefit made to Aflac pursuant to health insurance policies ending in T208, 79T5, and 79T8, contrary to the provisions of N.J.S.A. 2C:21-4.6a(1) and N.J.S.A. 2C:21-4.6c, and against the peace of this State, the government and dignity of the same.

**COUNT SEVEN**

**(THEFT BY DECEPTION - THIRD DEGREE)**

On various dates between on or about November 15, 2017 and June 22, 2018, at the City of Newark, in the County of Essex, and elsewhere, all within the jurisdiction of this Court,

**SHIRELL TODD**

did purposely obtain the property of another in an aggregate amount exceeding \$500.00 but less than \$75,000.00 by deception; that is, the said **SHIRELL TODD** did purposely obtain property from Aflac pursuant to the policies ending in T208 and 79T5 in an aggregate amount exceeding \$500.00 but less than \$75,000.00 by creating or reinforcing the false impression that the said **SHIRELL TODD** had received medical treatment or services from medical providers; whereas in truth and fact, the said **SHIRELL TODD** well knew that the said **SHIRELL TODD** had not received the medical treatment or services from medical providers alleged on the dates alleged and was not entitled to any payment, reimbursement, or other benefit from Aflac, contrary to the provisions of N.J.S.A. 2C:20-4a and N.J.S.A. 2C:20-2b(2) (a), and against the peace of this State, the government and dignity of the same.

**COUNTS EIGHT - FIFTY-ONE**

**(FALSIFYING OR TAMPERING WITH RECORDS - FOURTH DEGREE)**

On various dates between on or about November 15, 2017 and November 2, 2018, at the City of Newark, in the County of Essex, and elsewhere, all within the jurisdiction of this Court,

**SHIRELL TODD**

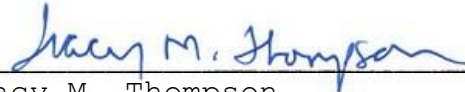
did falsify or utter any writing or record knowing that it contained a false statement or information, with purpose to deceive or injure anyone or to conceal any wrongdoing; that is, the said **SHIRELL TODD** falsified or uttered records to Aflac, as outlined in the following chart, knowing that the records contained a false statement or information; that is, the records falsely indicated that the said **SHIRELL TODD** received medical treatment or services from medical providers, whereas, in truth and in fact, the said **SHIRELL TODD** well knew that she had not received the medical treatment or services from medical providers on the dates alleged, and the said **SHIRELL TODD** acted with purpose to deceive Aflac into paying her under the policies ending in T208, 79T5, and 79T8, as follows:

Count	Claim Number (Last 4 Digits)	Date of Submission
Eight	0198	November 15, 2017, December 3, 2017, December 13, 2017, January 2, 2018, and January 18, 2018

<b>Count</b>	<b>Claim Number (Last 4 Digits)</b>	<b>Date of Submission</b>
Nine	0008	February 11, 2018
Ten	0059	April 21, 2018
Eleven	0091	April 30, 2018
Twelve	0870	June 5, 2018
Thirteen	5892	January 3, 2018
Fourteen	7707	January 8, 2018
Fifteen	0842	January 10, 2018
Sixteen	9603	January 10, 2018
Seventeen	8680	January 20, 2018
Eighteen	1360	January 25, 2018
Nineteen	4819	January 29, 2018
Twenty	0060	January 31, 2018
Twenty-One	3760	February 10, 2018
Twenty-Two	2286	February 11, 2018
Twenty-Three	4747	February 12, 2018
Twenty-Four	6034	February 15, 2018
Twenty-Five	1705	February 15, 2018
Twenty-Six	4744	February 22, 2018
Twenty-Seven	7378	February 26, 2018
Twenty-Eight	2486	March 19, 2018
Twenty-Nine	8307	March 19, 2018

<b>Count</b>	<b>Claim Number (Last 4 Digits)</b>	<b>Date of Submission</b>
Thirty	9164	March 20, 2018
Thirty-One	0677	April 2, 2018
Thirty-Two	3272	April 3, 2018
Thirty-Three	9857	April 4, 2018
Thirty-Four	0022	April 4, 2018
Thirty-Five	0344	April 4, 2018
Thirty-Six	5815	August 2, 2018
Thirty-Seven	6106	August 3, 2018
Thirty-Eight	9105	September 24, 2018
Thirty-Nine	7403	September 25, 2018
Forty	6212	October 1, 2018
Forty-One	0561	November 2, 2018
Forty-Two	3895	April 15, 2018
Forty-Three	9349	April 25, 2018
Forty-Four	0615	May 17, 2018
Forty-Five	9368	July 12, 2018
Forty-Six	7504	July 13, 2018
Forty-Seven	8087	July 31, 2018
Forty-Eight	7656	August 1, 2018
Forty-Nine	7673	August 1, 2018
Fifty	5389	September 19, 2018
Fifty-One	3773	September 20, 2018

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: 5/12/22