

SUPERIOR COURT OF N.J.

FILED

JAN 29 2004

DONALD F. PHELAN  
CLERK

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ489-04-2

Superior Court

Docket Number 04 - 01 - 00008 - S

STATE OF NEW JERSEY )

v. )

CHARLES A. WATKINS III )

INDICTMENT

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

COUNT ONE

(Theft By Deception-Third Degree)

CHARLES A. WATKINS III

between on or about May 24, 1998 and on or about May 22, 1999, at  
the City of Trenton, in the County of Mercer, elsewhere, and  
within the jurisdiction of this Court, purposely did obtain by  
deception property of the State of New Jersey valued in excess of  
\$500; that is, the said CHARLES A. WATKINS III did purposely  
obtain unemployment insurance benefits in the amount of \$5,670.00  
by submitting or causing to be submitted documents for  
unemployment insurance benefits to the State of New Jersey,  
thereby creating or reinforcing false impressions to the State of  
New Jersey that the said CHARLES A. WATKINS III was unemployed;

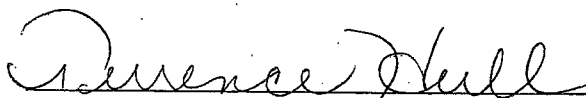
WHEREAS IN TRUTH AND IN FACT, as the said CHARLES A. WATKINS III then and there well knew, he was employed, all contrary to the provisions of N.J.S.A. 2C:20-4, and against the peace of this State, the government and dignity of the same.

COUNT TWO

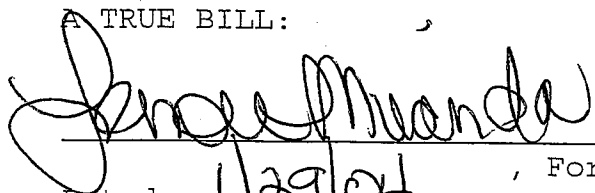
(Unsworn Falsification to Authorities-Fourth Degree)

CHARLES A. WATKINS III

on or about February 1, 1999, at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, knowingly did make a written false statement which he did not believe to be true on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable; that is, the said CHARLES A. WATKINS III did make and submit or cause to be submitted Unemployment Insurance Benefit check number 18081264 dated February 1, 1999, containing a false statement that the said CHARLES A. WATKINS III did report all earnings and holiday or vacation pay and otherwise met all eligibility requirements to receive unemployment insurance benefits for the weeks ending January 23, 1999 and January 30, 1999 and said form bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.

  
TERRENCE HULL, Chief  
Major Financial Crimes Bureau

A TRUE BILL:

  
\_\_\_\_\_  
Dated: 1/29/04 , Foreperson

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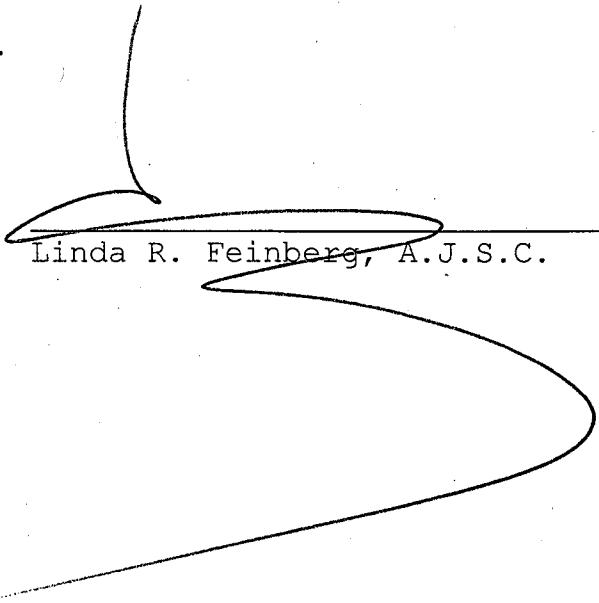
ORDER OF VENUE

CHARLES A. WATKINS III )

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 29th day of January, 2004, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.

  
Linda R. Feinberg, A.J.S.C.