

~~SUPERIOR COURT OF N.J.~~

**FILED**

**JUN 15 2004**

**DONALD F. PHELAN  
CLERK**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 492-04-8(1)

Superior Court 04 - 06 - 00096 - S  
Docket Number \_\_\_\_\_

STATE OF NEW JERSEY )

v. )

INDICTMENT

RENE BRADLEY-WILLIAMS )

also known as )

RENE ROBINSON )

and )

ROBERT BRADLEY, III )

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

COUNT ONE

(Theft of Services - Third Degree)

RENE BRADLEY-WILLIAMS

and

ROBERT BRADLEY, III

on or about October 22, 2002, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, purposely did obtain services, that is, the rental of a motor vehicle from Enterprise Leasing Company of Philadelphia, having an approximate value of \$900, which the said RENE BRADLEY-

WILLIAMS and ROBERT BRADLEY, III, knew to be available only for compensation, by deception, to avoid payment for service, contrary to the provisions of N.J.S.A. 2C:20-8(a) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Uttering a Forged Instrument - Third Degree)

RENE BRADLEY-WILLIAMS

and

ROBERT BRADLEY, III

on or about October 22, 2002, at the City of Vineland, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, uttered a writing which they knew to be forged in a manner specified in N.J.S.A. 2C:21-1a(2); that is, the said RENE BRADLEY-WILLIAMS and ROBERT BRADLEY, III did offer a check to Enterprise Leasing Company of Philadelphia, in the amount of \$900, said check drawn on an account allegedly owned by Bradley Associates, Inc. and signed by Robert Bradley, Jr. on account number 2079950021359 at First Union Bank of Delaware, an account belonging to the State of New Jersey, Division of Temporary Disability Insurance, so that it purported to be the act of Bradley Associates, Inc., who did not own the account and did not authorize the act, contrary to the provisions of N.J.S.A. 2C:21-1a(3) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Second Degree)

RENE BRADLEY-WILLIAMS

and

ROBERT BRADLEY, III

between on or about October 15, 2002 and on or about October 19, 2002, at the City of Millville, in the County of Cumberland, and at the Township of Egg Harbor, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, purposely did obtain or did attempt to obtain property of another by deception valued at \$75,000 or more, that is, the said RENE BRADLEY-WILLIAMS and ROBERT BRADLEY, III, purposely did obtain or did attempt to obtain motor vehicles, namely, a 2003 Lincoln Navigator belonging to Quality Lincoln Mercury, and a 2003 Mercedes Benz CLK500 belonging to Precision Cars of Atlantic City, whose total value was approximately \$75,000, by creating or reinforcing the false impression that checks payable to the said owners and drawn on account number 2079950021359 at First Union Bank of Delaware that were presented for payment for the vehicles would be honored;

WHEREAS, in truth and in fact, as the said RENE BRADLEY-WILLIAMS and ROBERT BRADLEY, III, well knew, the said checks would not be honored because the account upon which the checks were allegedly drawn belonged to the New Jersey Department of

Labor, Division of Temporary Disability Insurance, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

