

FILED

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

NOV 07 2013

State Grand Jury Judge

State Grand Jury

Number SGJ644-13-9

Superior Court

Docket Number

13-11-00208-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

STEPHANIE HAND,)

JULIO CONCEPCION, and)

THOMAS D'ANNA)

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

COUNT ONE

(Conspiracy - Second Degree)

STEPHANIE HAND

JULIO CONCEPCION

and

THOMAS D'ANNA

between on or about January 2009 and on or about April 2009 at the City of Garfield, in the County of Bergen, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of Financial Facilitation of Criminal Activity and Theft by Deception, did conspire, and agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crime(s), or an attempt or solicitation to commit such crime(s); or

B. One or more of them would aid in the planning, attempt, solicitation, or commission of the aforesaid crime(s), that is:

1. Financial Facilitation of Criminal Activity, in that one or more of them would engage in a transaction involving property, in an amount of \$75,000 or more, known or which a reasonable person would believe to be derived from criminal activity, knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(2)(a); or

2. Theft by Deception, in that one or more of them would purposely obtain property of another by deception, by creating or reinforcing a false impression, in an amount of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:20-4a.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Financial Facilitation of Criminal Activity - Second Degree)

STEPHANIE HAND

JULIO CONCEPCION

and

THOMAS D'ANNA

between on or about January 2009 and on or about April 2009, at the City of Garfield, in the County of Bergen, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did engage in a transaction involving property, to wit: funds in an amount of \$75,000 or more, known or which a reasonable person would believe to be derived from criminal activity, knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is, the said STEPHANIE HAND, JULIO CONCEPCION and THOMAS D'ANNA, did engage in one or more transactions of issuing checks, check deposits, wire transfers, and cash withdrawals, involving funds in an amount of \$75,000 or more, known to be derived from criminal activity, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25b(2)(a), N.J.S.A. 2C:21-27a, and

27a, 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)

STEPHANIE HAND

JULIO CONCEPCION

and

THOMAS D'ANNA

between on or about January 2009 and on or about April 2009, at the City of Garfield, in the County of Bergen, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did obtain the property of another by deception, in an amount of \$75,000 or more, to wit: approximately \$415,865.77 and \$457,655.45 mortgages, by creating or reinforcing the false impression to the lender, S.T.M.I, whose identity is known to the Grand Jurors, that the information reported in the mortgage application and U.S. Department of Housing and Urban Development (HUD) settlement form for the sale and purchase of property located at 248 River Road, Garfield, New Jersey, and 91 Isabella Avenue in Newark, New Jersey, was true and accurate,

WHEREAS IN TRUTH AND IN FACT, as the said STEPHANIE HAND, JULIO CONCEPCION, and THOMAS D'ANNA, well knew, that the information reported in the mortgage application and U.S. Department of Housing and Urban Development (HUD) settlement form, was not true and accurate, causing the said lender,

S.T.M.I. to approve applications for mortgages in amounts of \$75,000 or more, to wit: approximately \$415,865.77 and \$457,655.45, contrary to the provisions of N.J.S.A. 2C:20-4a, N.J.S.A. 2C:20-2b(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Christine A. Hoffman
Deputy Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: _____

11/7/13

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ORDER OF VENUE

STEPHANIE HAND)

JULIO CONCEPCION)

and)

THOMAS D'ANNA)

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

IT IS ORDERED on this 7th day of November, 2013, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Essex 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 Essex for filing.


Pedro J. Jimenez, Jr., J.S.C.