

P.O. 97-99
/nd
5/26/00
SUPERIOR COURT OF NEW JERSEY
BERGEN COUNTY - LAW DIVISION
MARCH TERM A.D. 1999
THIRD STATED SESSION

THE STATE OF NEW JERSEY :
-vs- :
THOMAS A. DE CLEMENTE : Indictment No.
: 00-05-1059-I
: DEFENDANTS :

The Grand Jurors of the State of New Jersey, for the
County of Bergen, upon their oaths present as a

FIRST COUNT
(Fourth Degree)

that THOMAS A. DE CLEMENTE, on or about June 1, 1995, in the
Township of Lyndhurst, in the County of Bergen, and within the
jurisdiction of this Court, did during the course of business,
make a false or misleading written statement for the purpose of
obtaining property or credit from Dr. Eugene Graziano,
Dr. Michael Ortiz and Dr. Manmohan Patel; contrary to the
provisions of N.J.S.A. 2C:21-7h, and against the peace of this
State, the Government and dignity of the same.

SECOND COUNT
(Third Degree)

AND the Grand Jurors aforesaid, upon their oaths aforesaid,
do further PRESENT that **THOMAS A. DE CLEMENTE, on or about**

November 13, 1995, in the Township of Lyndhurst, in the County of Bergen, and within the jurisdiction of this Court, did with the purpose to defraud Dr. Eugene Graziano, Dr. Michael Ortiz and Dr. Manmohan Patel did execute a writing, namely, a power of Attorney to satisfy Mortgage, so that it purported to be the act of Albert F. Buzzetti, who did not authorize said act, or of a fictitious person; contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government and dignity of the same.

THIRD COUNT
(Fourth Degree)

AND the Grand Jurors aforesaid, upon their oaths aforesaid, do further PRESENT that THOMAS A. DE CLEMENTE, on or about December 11, 1996, in the City of Jersey City, in the County of Hudson, and within the jurisdiction of this Court, did falsify, destroy, remove or conceal any writing or record, or utter any writing or record knowing that it contained a false statement or information, with the purpose to deceive or injure Dr. Eugene Graziano, Dr. Michael Ortiz and Dr. Manmohan Patel or to conceal any wrongdoing; contrary to the provisions of N.J.S.A. 2C:21-4, and against the peace of this State, the Government and dignity of the same.

FOURTH COUNT
(Fourth Degree)

AND the Grand Jurors aforesaid, upon their oaths aforesaid, do further PRESENT that THOMAS A. DE CLEMENTE, on or about November 13, 1996, in the Township of Lyndhurst, in the County of

Bergen, and within the jurisdiction of this Court, did during the course of business, make a false or misleading written statement for the purpose of obtaining property or credit from Dr. Eugene Graziano, Dr. Michael Ortiz and Dr. Manmohan Patel; contrary to the provisions of N.J.S.A. 2C:21-7H, and against the peace of this State, the Government and dignity of the same.

FIFTH COUNT
(Fourth Degree)

AND the Grand Jurors aforesaid, upon their oaths aforesaid, do further PRESENT that THOMAS A. DE CLEMENTE, on or about December 11, 1996, in the City of Jersey City, in the County of Hudson, and within the jurisdiction of this Court, did falsify, destroy, remove or conceal any writing or record, or utter any writing or record knowing that it contained a false statement or information, with the purpose to deceive or injure Dr. Eugene Graziano, Dr. Michael Ortiz and Dr. Manmohan Patel or to conceal any wrongdoing; contrary to the provisions of N.J.S.A. 2C:21-4, and against the peace of this State, the Government and dignity of the same.

SIXTH COUNT
(Third Degree)

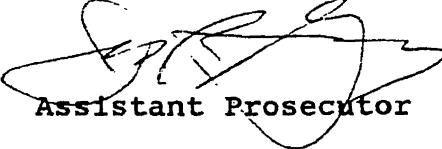
AND the Grand Jurors aforesaid, upon their oaths aforesaid, do further PRESENT that THOMAS A. DE CLEMENTE, on or about November 23, 1996, in the Borough of Glen Rock, in the County of Bergen, and within the jurisdiction of this Court, did with the purpose to defraud Dr. Eugene Graziano, Dr. Michael Ortiz and Dr. Manmohan Patel did execute a writing, namely, a assignment of

Mortgage, so that it purported to be the act of Albert F. Buzzetti, President of Bridgeview, who did not authorize said act, or of a fictitious person; contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the Government and dignity of the same.


SEVENTH COUNT
(Third Degree)

AND the Grand Jurors aforesaid, upon their oaths aforesaid, do further PRESENT that THOMAS A. DE CLEMENTE, on or about December 18, 1996, in the City of Jersey City, in the County of Hudson, and within the jurisdiction of this Court, did falsify, destroy, remove or conceal any writing or record, or utter any writing or record knowing that it contained a false statement or information, with the purpose to deceive or injure Dr. Eugene Graziano, Dr. Michael Ortiz and Dr. Manmohan Patel, or to conceal any wrongdoing; contrary to the provisions of N.J.S.A. 2C:21-4, and against the peace of this State, the Government and dignity of the same.

WILLIAM H. SCHMIDT
BERGEN COUNTY PROSECUTOR

By:  Assistant Prosecutor

A True Bill


Jess Panagia, Foreperson