

COMPLAINT - SUMMONS

COMPLAINT NUMBER

1352**S****2020****000525**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

WALL TOWNSHIP MUNICIPAL CT
2700 ALLAIRE RD
WALL NJ 07719-0000
732-449-4666 COUNTY OF: **MONMOUTH**

of CHARGES
1

CO-DEFTS

POLICE CASE #:
MCP2000050

COMPLAINANT
NAME: **DET M. ACQUAVIVA**
132 JERSEYVILLE AVE

FREEHOLD**NJ 07728***THE STATE OF NEW JERSEY**VS.***PATRICIA A VAUGHAN**

ADDRESS: **2073 WHITESVILLE ROAD**

TOMS RIVER**NJ 08755-0000**

DEFENDANT INFORMATION

SEX: **F** EYE COLOR: **BLUE**

DOB: [REDACTED]

DRIVER'S LIC. #:

DL STATE: **NJ**SOCIAL SECURITY #: **xxx-xx-xx**

SBI #:

TELEPHONE #: [REDACTED] (c)

LIVESCAN PCN #:

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **12/23/2019** in **WALL TWP**, **MONMOUTH** County, **NJ** did: WITHIN THE JURISDICTION OF THIS COURT, DID COMMIT THE CRIME OF THEFT BY UNLAWFULLY TAKING, OR EXERCISING CONTROL OVER, MOVABLE PROPERTY OF ANOTHER WITH PURPOSE TO DEPRIVE THEM THEREOF, SPECIFICALLY BY TAKING US CURRENCY IN AN AMOUNT EXCEEDING \$75,000 BETWEEN 2011 AND 2019, FROM HER EMPLOYER, WALL, NJ, IN VIOLATION OF 2C:20-3, A CRIME OF THE SECOND DEGREE.

in violation of:

Original Charge	1) 2C:20-3A	2)	3)
Amended Charge			

CERTIFICATION:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: **DET M. ACQUAVIVA** Date: **10/09/2020**

The complaining witness is a law enforcement officer and a judicial probable cause determination is not required prior to the issuance of this Complaint-Summons.

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Superior Court in the county of: **MONMOUTH**
at the following address: **MONMOUTH COUNTY COURTS**

71 MONUMENT PARK**PO BOX 1271****FREEHOLD****NJ 07728-0000**

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest: **10/09/2020** Appearance Date: **11/24/2020** Time: **09:00AM** Phone: **732-358-8700**

Signature of Person Issuing Summons: **DET M. ACQUAVIVA** Date: **10/09/2020**

☐ **Domestic Violence – Confidential**☐ **Related Traffic Tickets
or Other Complaints**☐ **Serious Personal Injury/ Death
Involved****Special conditions of release:**

- ☐ **No phone, mail or other personal contact w/victim**
☐ **No possession firearms/weapons**
☐ **Other (specify):**

ORIGINAL

Affidavit of Probable Cause

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> <i>VS.</i> PATRICIA A VAUGHAN ADDRESS: 2073 WHITESVILLE ROAD TOMS RIVER NJ 08755-0000	
1352	S	2020	000525		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
WALL TOWNSHIP MUNICIPAL CT 2700 ALLAIRE RD WALL NJ 07719-0000 732-449-4666 COUNTY OF: MONMOUTH					
# of CHARGES 1	CO-DEFTS	POLICE CASE #: MCP2000050		DEFENDANT INFORMATION SEX: F EYE COLOR: BLUE DOB: [REDACTED] DRIVER'S LIC. #. [REDACTED] DL STATE: NJ SOCIAL SECURITY #: xxx-xx-[REDACTED] SBI #: TELEPHONE #: [REDACTED] (C) LIVESCAN PCN #:	
COMPLAINANT DET M. ACQUAVIVA					
NAME: 132 JERSEYVILLE AVE					
FREEHOLD NJ 07728					

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:

I, Michael Acquaviva, am a detective with the Monmouth County Prosecutor's Office (MCPO). I have participated in this investigation and am aware of the facts contained herein, based upon my own investigation, as well as information provided to me by other law enforcement officers. Because this Attachment is submitted for the limited purpose of establishing probable cause, I have not included herein the details of every aspect of the investigation. Statements attributable to individuals contained in this Attachment are related in substance and in part, except where otherwise indicated.

In January 2020, the Monmouth County Prosecutor's Office was contacted by the Wall Township Police. The Wall Police received a theft report from the owner of a law office in Wall Twp. It was reported that the former Office Manager Patricia Vaughan stole funds.

During the investigation records of various business and personal accounts related to the law practice were reviewed revealing numerous unauthorized transfers of funds from these accounts into the firm's operating account. Vaughn made these transfers in her capacity as office manager, although she hid them by creating false bank statements. Vaughan then used the additional money from the operating account to give herself unauthorized salary increases and to issue herself extra paychecks. Vaughan received thousands of dollars to which she was not entitled each year from 2011 through 2019, as illustrated below:

The following is a breakdown of Vaughan's unauthorized salary increases and extra pay checks:

Year	Extra Paychecks	Extra Salary
2011	\$7,230.00	\$0.00
2012	\$6,922.50	\$0.00
2013	\$7,230.00	\$805.00
2014	\$11,160.00	\$1,505.00
2015	\$13,640.00	\$1,820.00
2016	\$14,140.00	\$3,270.00
2017	\$12,435.00	\$2,850.00
2018	\$4,560.00	\$7,680.00
2109	\$2,540.00	\$7,565.00
Total	\$79,857.50	\$25,695.00
Grand Total:	\$105,552.50	

In conclusion, based on the above, probable cause exists to show that Vaughan has committed

the crime of NJSA 2C:20-3, Theft of By Unlawful Taking (2nd degree).

Affidavit of Probable Cause

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1/1/2017

Affidavit of Probable Cause

COMPLAINT NUMBER

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THE STATE OF NEW JERSEY

VS.

PATRICIA A VAUGHAN

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

Police investigation, victim statement

3. If victim was injured, provide the extent of the injury:

No injury

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DET M. ACQUAVIVA LAW ENFORCEMENT OFFICER

Date: 10/09/2020

Affidavit of Probable Cause

Preliminary Law Enforcement Incident Report

COMPLAINT NUMBER			
1352	S	2020	000525
COURT CODE	PREFIX	YEAR	SEQUENCE NO.

THE STATE OF NEW JERSEY

VS.

PATRICIA A VAUGHAN

WALL TOWNSHIP MUNICIPAL CT
 2700 ALLAIRE RD
 WALL NJ 07719-0000
 732-449-4666 COUNTY OF: MONMOUTH

ADDRESS: 2073 WHITESVILLE ROAD
 TOMS RIVER NJ 08755-0000

# of CHARGES 1	CO-DEFTS	POLICE CASE #: MCP2000050
COMPLAINANT NAME: DET M. ACQUAVIVA 132 JERSEYVILLE AVE FREEHOLD NJ 07728		

DEFENDANT INFORMATION
 SEX: F EYE COLOR: BLUE DOB: [REDACTED]
 DRIVER'S LIC. #: [REDACTED] DL STATE: NJ
 SOCIAL SECURITY #: xxx-xx-3 [REDACTED] SBI #: [REDACTED]
 TELEPHONE #: [REDACTED] (C)
 LIVESCAN PCN #: [REDACTED]

Purpose: The Preliminary Law Enforcement Incident Report (PLEIR) is intended to document basic information known to the officer at the time of its preparation. It is recognized that additional relevant information will emerge as an investigation continues. The PLEIR shall be in addition to, not in lieu of, any regular police arrest, incident, or investigation reports. Note that the PLEIR is specific to each defendant charged in an investigation.

- The defendant was known to the victim as:
 - Other/Explain Employer
- Physical evidence was seized/recovered:
 - Other Type(s) of physical evidence Computer
- The case involved theft and/or stolen property. The property which was stolen and/or possessed is currency
- The investigation involved the seizure of one or more cellphones, computers or similar electronic devices.
 List the type of device(s) and total number of each recovered: 1

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DET M. ACQUAVIVA LAW ENFORCEMENT OFFICER Date: 10/09/2020

Preliminary Law Enforcement Incident Report

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7/20/2018

**WALL TOWNSHIP POLICE DEPARTMENT
MONMOUTH COUNTY, NEW JERSEY
ARREST REPORT**

Complaint Number 202000245		Mun. Code 1352		Phone Number 732-449-4500		UCR		Prosecutor's Case Number		Department Case Number 202000245	
Name (Last, First, Middle) VAUGHAN, PATRICIA ANN								Phone [REDACTED]		Alias - Nickname	
Current Address 2073 WHITESVILLE RD, TOMS RIVER, NJ 08755										Place of Birth	
DOB [REDACTED]	Age 62	Race W	Sex F	Hgt 5'0	Wgt 140	Hair Brown	Eye Blue	Complexion			
Scars, Marks, Tattoos										OL and State [REDACTED]	
Employer's Name (School Name) GERTLER LAW FIRM								Occupation (Grade) Office Manager		Social Security # [REDACTED]	
Address 1340 CAMPUS PARKWAY, WALL NJ										Phone [REDACTED]	

DETAILS OF ARREST

Date / Time Reported 10/09/2020 11:22 Fri		Place of Arrest 2700 ALLAIRE RD, WALL TOWNSHIP					Municipal Code 1352	
Charge #1 Theft By Unlawful Taking		Type Fel	Counts 1	IBR Code 061	Warrant / Summons # S 2020 525	Statute # 2C:20-3	Warr. Date	
Charge #2		Type	Counts	IBR Code	Warrant / Summons #	Statute #	Warr. Date	
Charge #3		Type	Counts	IBR Code	Warrant / Summons #	Statute #	Warr. Date	
If Armed, Type of Weapon NOT APPLICABLE		Type of Arrest ON-VIEW						
VYR	Make	Model	Style		Color	Lic/Lis	Vin	
Vehicle:								

BAIL INFORMATION

Date/Time Confined 10/09/2020		Court of Wall Township		City WALL		Committing Magistrate	
Amt. Bond		Type Bond No Bond		Trial Date 11/24/2020		Place Confined WALL PD PROCESSING	
Date/Time Released 10/09/2020 11:50:00		Released By: Name/ID Number/Bureau MARINO, A. T. PATL2ND					

NARRATIVE

Subsequent to a theft investigation, Patricia Vaughan turned herself in at HQ where she was placed under arrest. Ms. Vaughan was processed for one count of theft and released on a Summons Complaint. See IR for further.

Arresting Officer Signature/ID #/Bureau MARINO, A. T. (PATL, 2ND) (181)	
Case Status Ar	Arrestee Signature

WALL TOWNSHIP PD

Event Report

Event ID: 2020-0121-0085

Call Ref #: 624

Date/Time Received: 01/21/20 09:36:56

Rpt #: 2020-00245	Prime W181	Services Involved			
Call Source: PHONE	Unit: MARINO, ANTHONY THOMAS	LAW			
Location: 1340-SB4 CAMPUS PKWY		Jur: WTPD Service: LAW Agency: WTPD			
X-ST: OUTLOOK DR		St/Beat: PST1		District:	RA: N3
STATE HWY 34					
Business: GERTLER LAW FIRM	Phone: [REDACTED]			GP: PST1	
Nature: THEFT	Alarm Lvl: 1	Priority: 2	Medical Priority:		
Reclassified Nature:					
Caller: STEVEN GERTLER			Alarm:		
Addr: 1340-SB4 CAMPUS PKWY	Phone:	Alarm Type:			
Vehicle #:	St:	Report Only: No	Race:	Sex:	Age:
Call Taker: W558	Console: D1				
Geo-Verified Addr.: Yes	Nature Summary Code: THFT	Disposition: C	Close Comments:		

Notes:

See Event Notes Addendum at end of this report

Times

Call Received: 01/21/20 09:36:56	Time From Call Received		
Call Routed: 01/21/20 09:37:43	000:00:47	Unit Reaction:	(1st Dispatch to 1st Arrive)
Call Take Finished: 01/21/20 09:37:43	000:00:47	En-Route:	(1st Dispatch to 1st En-Route)
1st Dispatch: 01/21/20 09:59:23	000:22:27 (Time Held)	On-Scene:	(1st Arrive to Last Clear)
1st En-Route:			
1st Arrive:	(Reaction Time)		
Last Clear: 01/21/20 10:00:00	000:23:04		

Radio Log

Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
W181	181	D	Dispatched	01/21/20 09:59:23			W558
W181	181	C	Cleared	01/21/20 10:00:00		C	W558

Event Log

Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
		TR	Time Received	01/21/20 09:36:56	By: PHONE		W558
		ENT	Entered Street	01/21/20 09:37:04	STEV		W558
		CHG	Changed Street	01/21/20 09:37:11	STEV --> 1340-SB4 CAMPUS PKWY		W558
		ENT	Entered Nature	01/21/20 09:37:30	THEFT		W558

