

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - OCEAN COUNTY

THE STATE OF NEW JERSEY :

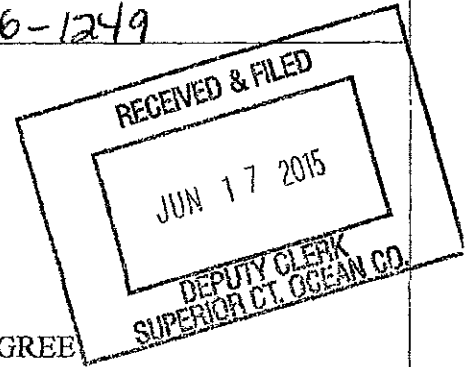
VS. :

KEITH BOYCE :

Defendant :

INDICTMENT

NO. 15-06-1249



COUNT ONE  
THEFT BY DECEPTION - THIRD DEGREE

The Grand Jurors of the State of New Jersey, in and for the County of Ocean, upon their oaths present that KEITH BOYCE, aka Keith Gergrich, on or about January 12, 2014, in the Township of Lacey, in the County of Ocean aforesaid, and within the jurisdiction of this Court, purposely did obtain \$7,500 in funds from Victoria Tsougarakis, by deception, that is by creating or reinforcing a false impression that he was leasing her a residence at 1226 Laurel Blvd., Lanoka Harbor and that the money provided would be used for a security deposit, improvements and the first three months rental payments, 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  
TERRORISTIC THREAT - FOURTH DEGREE

The Grand Jurors of the State of New Jersey, in and for the County of Ocean, upon their oaths present that KEITH BOYCE, aka Keith Gergrich, on or about February 3, 2014, in the Township of Lacey, in the County of Ocean aforesaid, and within the jurisdiction of this

Court, with purpose to terrorize Victoria Tsougarakis, did threaten to commit a crime of violence, that is, did threaten to kill Victoria Tsougarakis, contrary to the provisions of N.J.S.A. 2C:12-3b, and against the peace of this State, the Government and dignity of the same.

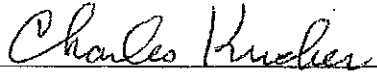
COUNT THREE  
THEFT BY DECEPTION - THIRD DEGREE

The Grand Jurors of the State of New Jersey, in and for the County of Ocean, upon their oaths present that KEITH BOYCE, aka Keith Gergrich, on or about February 1, 2014, in the Township of Lacey, in the County of Ocean aforesaid, and within the jurisdiction of this Court, purposely did obtain \$1,700 in funds from Rebecca Kendrick, by deception, that is by creating or reinforcing a false impression that he was leasing her a residence at 1226 Laurel Blvd., Lanoka Harbor and that the money provided would be used for a security deposit, 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.

JOSEPH D. CORONATO  
OCEAN COUNTY PROSECUTOR

DATED: 6/17/15

BY:   
WILLIAM SCHARFENBERG  
ASSISTANT PROSECUTOR

ENDORSED:   
Foreperson

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION-OCEAN COUNTY

THE STATE OF NEW JERSEY

VS.

KEITH BOYCE and  
CAMILLA CAMPOS BOYCE

Defendants

INDICTMENT

NO. 16-09-1792

RECEIVED & FILED

SEP 13 2016

DEPUTY CLERK  
SUPERIOR CT. OCEAN CO.

COUNT ONE - THIRD DEGREE  
FAILURE TO FILE GROSS INCOME TAX RETURN

The Grand Jurors of the State of New Jersey, for the County of Ocean, upon their oaths present that KEITH BOYCE and CAMILLA CAMPOS BOYCE (husband & wife), between the dates of April 15, 2012 and October 15, 2012, in the Township of Lacey, County of Ocean, in the City of Trenton, County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file a tax return or a report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid or otherwise not make timely payment of any tax, fee, penalty, interest or any part thereof due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:8-1 et seq., as amended or supplemented, or any State tax law, that is, the said KEITH BOYCE and CAMILLA CAMPOS BOYCE (husband & wife), did fail to file a New Jersey Gross Income Tax Return required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1 with the intent to defraud or evade payment or any part thereof New Jersey Gross Income Tax, for the tax year ending 2011 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the Government and dignity of the same.

COUNT TWO - THIRD DEGREE  
FAILURE TO FILE GROSS INCOME TAX RETURN

The Grand Jurors of the State of New Jersey, for the County of Ocean, upon their oaths present that KEITH BOYCE and CAMILLA CAMPOS BOYCE (husband & wife), between the dates of April 15, 2013 and October 15, 2013, in the Township of Lacey, County of Ocean, in the City of Trenton, County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file a tax return or a report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid or otherwise not make timely payment of any tax, fee, penalty, interest or any part thereof due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:8-1 et seq., as amended or supplemented, or any State tax law, that is, the said KEITH BOYCE and CAMILLA CAMPOS BOYCE (husband & wife), did fail to file a New Jersey Gross Income Tax Return required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1 with the intent to defraud or evade payment or any part thereof New Jersey Gross Income Tax, for the tax year ending 2012 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the Government and dignity of the same.

COUNT THREE - THIRD DEGREE  
FAILURE TO FILE GROSS INCOME TAX RETURN

The Grand Jurors of the State of New Jersey, for the County of Ocean, upon their oaths present that KEITH BOYCE and CAMILLA CAMPOS BOYCE (husband & wife), between the dates of April 15, 2014 and October 15, 2014, in the Township of Lacey, County of Ocean, in the City of Trenton, County of Mercer, elsewhere, and within the jurisdiction of

this Court, did fail to file a tax return or a report required to be filed pursuant to the provisions of any State tax law with the intent to defraud the State or to evade, avoid or otherwise not make timely payment of any tax, fee, penalty, interest or any part thereof due pursuant to the provisions of the State Uniform Tax Procedure Law, N.J.S.A. 54:8-1 et seq., as amended or supplemented, or any State tax law, that is, the said KEITH BOYCE and CAMILLA CAMPOS BOYCE (husband & wife), did fail to file a New Jersey Gross Income Tax Return required to be filed pursuant to the provisions of N.J.S.A. 54A:8-1 with the intent to defraud or evade payment or any part thereof New Jersey Gross Income Tax, for the tax year ending 2013 to the Director of the Division of Taxation in the Department of the Treasury of the State of New Jersey, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the Government and dignity of the same.

JOSEPH D. CORONATO  
OCEAN COUNTY PROSECUTOR

DATED: 9/13/16

BY:

  
WILLIAM SCHARFENBERG  
SENIOR ASSISTANT PROSECUTOR

ENDORSED:

  
FOREPERSON