

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No.  
 :  
 v. : 18 U.S.C. §§ 371, 666(a)(1)(A), and 2  
 :  
 SHAUNETTE R. MOODY and :  
 ALEXANDER MOODY : **INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

**COUNT 1**  
**(Conspiracy)**

1. At all times relevant to this Indictment:

**The Federal Programs**

a. The United States Department of Education ("DOE") was an agency of the United States that provided funds to individual universities for educational objectives.

b. The New Jersey City University ("NJCU") was a public university located in Jersey City, New Jersey, which received annual benefits in excess of \$10,000 from the DOE and other federal agencies for each calendar year from 2007 through 2010 pursuant to numerous federal assistance programs, including Federal Supplemental Education Opportunity Grants, Federal Family Education Loans, Federal Perkins Loans, Federal Pell Grants, and Student Support Services.

c. The NJCU Student Government Organization ("SGO") was an organization controlled by NJCU and comprised of elected student officers and NJCU officials.

The NJCU SGO's mission was to further NJCU's educational objectives by serving as a link between the NJCU student body and administration. The NJCU SGO was entirely funded by transfer of approximately \$600,000 of NJCU funds annually into SGO financial accounts.

The Defendants

d. Defendants SHAUNETTE R. MOODY and ALEXANDER

MOODY resided in Hudson County, New Jersey.

e. Defendant SHAUNETTE R. MOODY was an NJCU employee whose duties included acting as office manager for the SGO, with responsibility for management of the SGO financial accounts. Defendant SHAUNETTE R. MOODY did not have signature authority for SGO-issued checks, however. Another NJCU employee exercised check signature authority.

f. Defendant ALEXANDER MOODY was defendant SHAUNETTE R. MOODY's spouse, but was never a NJCU nor SGO employee, contractor, or vendor.

The Charge

2. From on or about May 7, 2007 through on or about June 25, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendants

SHAUNETTE R. MOODY and

ALEXANDER MOODY

did knowingly and intentionally conspire and agree with each other and other uncharged persons to commit an offense against the United States, that is, while defendant SHAUNETTE R. MOODY was an agent of NJCU, to embezzle, steal, obtain by fraud, and otherwise without

authority knowingly convert to the use of defendants SHAUNETTE R. MOODY, ALEXANDER MOODY, and other uncharged persons, and to intentionally misapply, property with a value of \$5,000 or more, that was owned by, and was under the care, custody, or control of NJCU, contrary to 18 U.S.C. § 666(a)(1)(A).

The Object of the Conspiracy

3. The principal object of the conspiracy was to steal NJCU funds, which had been deposited in SGO financial accounts.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that, between May 7, 2007 and June 25, 2010, defendant SHAUNETTE R. MOODY caused at least 114 unauthorized NJCU SGO checks to be issued, payable to defendant ALEXANDER MOODY. The total value of these checks was \$203,806. The signature authorizing most or all of these checks was forged.

5. It was further part of the conspiracy that, between May 7, 2007 and June 25, 2010, defendant SHAUNETTE R. MOODY caused at least 12 unauthorized NJCU SGO checks to be issued, payable to defendant SHAUNETTE R. MOODY. The total value of these checks was \$23,820. The signature authorizing most or all of these checks was forged.

6. It was further part of the conspiracy that, between May 7, 2007 and June 25, 2010, defendant SHAUNETTE R. MOODY caused at least 111 additional unauthorized NJCU SGO checks to be issued, payable to other uncharged persons. The total value of these checks was \$237,574.68. The signature authorizing most or all of these checks was forged.

7. It was further part of the conspiracy that, between May 7, 2007 and June 25, 2010, defendant SHAUNETTE R. MOODY caused at least 237 unauthorized NJCU SGO

checks, valued at least \$465,200, to be issued payable to herself, defendant ALEXANDER MOODY, and other uncharged persons.

8. It was further part of the conspiracy that at least 219 of these 237 unauthorized NJCU SGO checks, valued at \$424,880, were endorsed by the unauthorized payee and negotiated by defendants SHAUNETTE R. MOODY, ALEXANDER MOODY, and other uncharged persons for U.S. currency.

Overt Acts

9. In furtherance of the conspiracy and in order to effect the object thereof, on or about the dates indicated below, defendants SHAUNETTE R. MOODY, ALEXANDER MOODY, and other uncharged persons committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere, by issuing, endorsing, and negotiating for currency:

Overt Act	Check Number	Date Cashed	Amount	Payee
A	6632	6/11/2009	\$4,650	ALEXANDER MOODY
B	6723	10/29/2009	\$2,675	SHAUNETTE R. MOODY

In violation of Title 18, United States Code, Section 371.

**COUNT 2**  
**(Theft from Organization Receiving Federal Benefits)**

1. Paragraphs 1 and 4 through 9 of Count 1 are incorporated and realleged as if set in full herein.

2. From on or about May 7, 2007 through on or about June 25, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

SHAUNETTE R. MOODY

being an agent of NJCU, embezzled, stole, obtained by fraud, and otherwise without authority knowingly converted to the use of defendants SHAUNETTE R. MOODY, ALEXANDER MOODY, and other uncharged persons, and intentionally misapplied, property with a value of \$5,000 or more, that was owned by, and was under the care, custody, or control of NJCU.

In violation of 18 U.S.C. §§ 666(a)(1)(A) and 2.

**COUNT 3**

**(Aiding and Abetting Theft from Organization Receiving Federal Benefits)**

1. Paragraphs 1 and 4 through 9 of Count 1 are incorporated and realleged as if set in full herein.

2. From on or about May 7, 2007 through on or about June 25, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant


ALEXANDER MOODY

aided and abetted defendant SHAUNETTE R. MOODY, who being an agent of NJCU, embezzled, stole, obtained by fraud, and otherwise without authority knowingly converted to the use of defendants SHAUNETTE R. MOODY, ALEXANDER MOODY, and other uncharged persons, and intentionally misapplied, property with a value of \$5,000 or more, that was owned by, and was under the care, custody, or control of NJCU.

In violation of 18 U.S.C. §§ 666(a)(1)(A) and 2.

A TRUE BILL

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FOREPERSON

  
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PAUL J. FISHMAN  
UNITED STATES ATTORNEY