
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. André M. Espinosa
 :
 v. : Mag. No. 24-11198
 :
 STACY MARGARITONDO : **CRIMINAL COMPLAINT**
 :
 : **Filed Under Seal**

I, Alexis Howell, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Alexis Howell

Alexis Howell, Special Agent
Federal Bureau of Investigation

Special Agent Howell attested to the facts of this application telephonically pursuant to F.R.C.P. 4.1(b)(2)(A) on July 22, 2024.

HONORABLE ANDRÉ M. ESPINOSA
UNITED STATES MAGISTRATE JUDGE

Hon. André M. Espinosa

Signature of Judicial Officer

ATTACHMENT A

Count One
(Wire Fraud)

From at least in or around December 2019 through in or around May 2023, in the District of New Jersey and elsewhere, the defendant,

STACY MARGARITONDO,

did knowingly and intentionally devise a scheme and artifice to defraud the Victim Synagogue and to obtain money and property from the Victim Synagogue by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing this scheme and artifice to defraud, did knowingly transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, namely the deposit of a check for approximately \$4,877 from the Victim Synagogue's bank account into Margaritondo's bank account causing an interstate wire that traveled through New Jersey to servers in Alabama.

In violation of Title 18, United States Code, Section 1343.

ATTACHMENT B

I, Alexis Howell, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Unless specifically indicated, all conversations and statements described herein are related in substance and in part.

BACKGROUND

1. At all times relevant to this criminal complaint:
 - a. Defendant Stacy Margaritondo (“MARGARITONDO”) resided in Scotch Plains, New Jersey and was employed as a bookkeeper at the Victim Synagogue.
 - b. The “Victim Synagogue” was a religious institution based in Union County, New Jersey.
 - c. “Individual-1” was the treasurer of the Victim Synagogue’s Board of Directors (“BOD”) and member of its Finance Committee.
 - d. “Bank-1” was a financial institution headquartered in San Francisco, California with all of its servers located outside of the District of New Jersey.

2. As set forth below, MARGARITONDO used her position as bookkeeper at the Victim Synagogue to engage in an embezzlement scheme to misappropriate more than approximately \$350,000 from the Victim Synagogue’s bank accounts, which she had access to because of her role as bookkeeper.

The Scheme to Defraud

3. In or around 2010, the Victim Synagogue hired MARGARITONDO. She was promoted to office manager and bookkeeper in or around July 2020. MARGARITONDO’s duties included, among other things, accounting/bookkeeping, payroll, preparing checks for accounts payable, and reporting to the Victim Synagogue’s BOD regarding the Victim Synagogue’s financial condition.

4. As part of the embezzlement scheme and without authorization, MARGARITONDO: (1) routinely issued unauthorized checks made payable to herself drawn on the Victim Synagogue’s bank accounts; (2) obtained unauthorized

additional funds by fraudulently using the Victim Synagogue's name, bank statements, and balance sheet to obtain short-term financing from at least three cash advance companies to conceal the embezzlement scheme; and (3) intentionally kept inaccurate accounting records and altered bank statements that she provided to the BOD to conceal her scheme.

5. For example, between in and around December 2019 and in and around October 2022, MARGARITONDO issued approximately 55 unauthorized checks, made payable to herself, from the Victim Synagogue's bank accounts. MARGARITONDO then deposited each of the checks into one of two personal accounts she maintained at Bank-1. MARGARITONDO deposited all but approximately five of the fraudulent checks into her Bank-1 accounts using the mobile deposit feature offered through Bank-1's cellphone application.

6. At all times relevant to this complaint, only Individual-1 and three other members of the Victim Synagogue's BOD had signatory authority on the Victim Synagogue's bank accounts. At no time did MARGARITONDO have authority to sign checks on the Victim Synagogue's behalf.

7. Therefore, to accomplish her fraudulent scheme, MARGARITONDO forged Individual-1's signature on each check, then endorsed the back of the checks with her own signature.

8. As part of the investigation, law enforcement spoke to Individual-1, who positively identified approximately 55 checks drawn on the Victim Synagogue's bank accounts. Individual-1 confirmed that the checks did not bear Individual-1's true signature and were made payable to MARGARITONDO and deposited into her Bank-1 accounts. These forged checks totaled approximately \$161,175.61.

Representative Fraudulent Transactions

9. For example, on or about the dates set forth below, MARGARITONDO deposited forged checks into her Bank-1 accounts to cause the following transactions (all dates and figures are approximate):

Check Date	Check No.	Total Deposit
12/2/2019	89319	\$2,500
11/3/2020	89887	\$3,564.86
2/26/2021	90030	\$4,980
1/6/2022	90432	\$4,877
10/5/2022	90720	\$1,950

10. MARGARITONDO caused these and other transactions to be made without the Victim Synagogue's knowledge or authorization.

11. To perpetuate and conceal her embezzlement scheme, MARGARITONDO fraudulently obtained approximately \$300,000 in cash advances in the Victim Synagogue's name to offset the Victim Synagogue's bank account balances each month.