UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon. Steven C. Mannion

v.

Mag. No. 14-6082 (SCM)

DONALD GRIDIRON, JR.

CRIMINAL COMPLAINT

I, Abigail M. Weidner, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

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

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

continued on the attached page and made a part hereof.

Abigail M. Weidner, Special Agent Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

December 1, 2014

at Newark, New Jersey

HONORABLE STEVEN C. MANNION UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

From at least in or about May 2007 through in or about March 2014, in the District of New Jersey and elsewhere, defendant DONALD GRIDIRON, JR., did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud a worship center based in Union County, New Jersey (the "Worship Center"), and to obtain money and property from the Worship Center by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, namely, wire transfers from the Worship Center's bank accounts in New Jersey to, among other locations, his personal bank accounts in, among other places, California.

ATTACHMENT B

I, Abigail M. Weidner, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am 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 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 statements of others are related herein, they are related in substance and in part unless otherwise indicated. 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.

Background

- 1. At all times relevant to this Complaint:
- a. Defendant DONALD GRIDIRON, JR. ("defendant GRIDIRON"), was a Certified Public Accountant and a resident of California who provided accounting services to, among others, a worship center based in Union County, New Jersey (the "Worship Center").
- b. The Worship Center maintained bank accounts in New Jersey (the "Bank Accounts").
- c. "The Foundation" was a non-profit entity registered in California, which maintained a bank account in California. As of 2014, defendant GRIDIRON was the treasurer of the Foundation and was one of the individuals with signatory control over the Foundation's bank account in California.

Defendant GRIDIRON's Fraudulent Activity

2. Prior to 2007, the Worship Center hired defendant GRIDIRON to provide accounting services. The Worship Center hired defendant GRIDIRON based, in part, on defendant GRIDIRON's connections with individuals in the religious community as well as his standing within that community. Pursuant to the terms of his employment, the Worship Center agreed to: (a) pay defendant GRIDIRON a monthly salary, which by March 2014 was approximately \$5,500; and (b) reimburse defendant GRIDIRON for reasonable expenses related to his work for the Worship Center. Apart from this salary and reimbursement, defendant GRIDIRON was not entitled to any other funds from the Worship Center.

- 3. During his employment with the Worship Center, defendant GRIDIRON was provided with blank checks under the assumption that the checks would be used to pay some of the Worship Center's bills and expenses. A review of Bank Accounts records, however, revealed that between 2007 and 2014 defendant GRIDIRON issued unauthorized checks, which caused wires from the Bank Accounts in New Jersey to accounts that he controlled, in among other places, California. In addition, a review of records concerning the Bank Accounts revealed that additional wires were sent during this time from the Bank Accounts in New Jersey to accounts that defendant GRIDIRON controlled, in among other places, California. In total, defendant GRIDIRON defrauded the Worship Center of over \$4.25 million in this manner, with more than \$2,750,000 going to his personal accounts, and more than \$1,500,000 going to the Foundation's bank account. The above amounts were in addition to the monthly salary and reimbursement of expenses to which defendant GRIDIRON was entitled and were not authorized by the Worship Center.
- 4. Moreover, after diverting the Worship Center's funds to personal accounts that he controlled, defendant GRIDIRON used funds in those accounts for his own use, including payments on a mortgage for his personal residence, payments to a luxury car dealership; and withdrawals in furtherance of his gambling. For example, on or about January 7, 2014, defendant GRIDIRON caused a wire in the amount of approximately \$17,500 to be sent from the Bank Accounts in New Jersey to one of his personal accounts in California. Records from this personal account demonstrate that later that day a significant amount, if not all, of this money was withdrawn at a casino in California.
- 5. As part of his services to the Worship Center, defendant GRIDIRON provided periodic financial updates to the Worship Center's board members. The investigation has not revealed any evidence that prior to March 2014 defendant GRIDIRON told the Worship's Center board members that money had been disbursed in the manner described above.
- 6. An individual associated with the Worship Center told law enforcement that on or about March 11, 2014, defendant GRIDIRON told the individual that he had been taking money from the Bank Accounts without authorization for over seven years and that he had taken more than \$1,000,000. The individual further stated that he/she did not authorize anyone to provide any money from the Worship Center to the Foundation. Further, the individual stated that as of October 2014 he/she was not aware of anyone at the Worship Center who authorized the transfer of funds from the Worship Center to the Foundation.