

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 15-_____
	:	
	:	18 U.S.C. § 1343
DONALD GRIDIRON, JR	:	26 U.S.C. § 7206(1)

INFORMATION

COUNT ONE

(Wire Fraud)

The defendant having waived in open court prosecution by indictment, and any objections based upon venue, the United States Attorney for the District of New Jersey charges:

BACKGROUND

1. At all times relevant to this Information:
 - a. Defendant DONALD GRIDIRON, JR. ("GRIDIRON"), was a resident of California and a Certified Public Accountant, who provided accounting services to, among others, a worship center based in or around Rahway, New Jersey (the "Worship Center").
 - b. The Worship Center maintained bank accounts in New Jersey (the "Bank Accounts"). Defendant Gridiron, as the Worship Center's accountant, had access to blank checks drawn on the Bank Accounts, which checks he was authorized to issue only to pay the Worship Center's legitimate bills and expenses.

c. "The Foundation" was a non-profit entity registered in California, which maintained a bank account in California. As of in or about 2014, defendant GRIDIRON was the Foundation's treasurer and had signatory control over the Foundation's bank account.

THE SCHEME TO DEFRAUD

2. From at least as early as in or about May 2007 through in or about March 2014, in the District of New Jersey and elsewhere, the defendant,

DONALD GRIDIRON, JR.,

did knowingly devise and intend to devise a scheme and artifice to defraud the Worship Center and the Foundation, and to obtain money and property from the Worship Center and the Foundation 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 California, as more fully set forth below.

OBJECT OF THE SCHEME

3. The object of the scheme and artifice to defraud was for defendant GRIDIRON to enrich himself by embezzling money from the Worship Center and the Foundation.

MANNER AND MEANS OF THE SCHEME

4. It was part of the scheme and artifice to defraud that defendant GRIDIRON issued unauthorized checks drawn on the Worship Center's Bank Accounts and made payable to accounts that defendant GRIDIRON controlled in California, among other places, which caused wire transfers to be sent from New Jersey to locations outside of New Jersey.

5. It was further part of the scheme and artifice to defraud that defendant GRIDIRON caused additional unauthorized wire transfers to be sent from the Worship Center and Foundation's bank accounts to accounts that defendant GRIDIRON controlled.

6. It was further part of the scheme and artifice to defraud that using the manner and means described above, defendant GRIDIRON defrauded the Worship Center and the Foundation of more than \$4,000,000.

7. On or about January 7, 2014, for the purpose of executing the aforesaid scheme and artifice to defraud, in the District of New Jersey, and elsewhere, the defendant,

DONALD GRIDIRON, JR.,

knowingly transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, namely, a wire transfer in the amount of approximately \$17,500 from one of the Bank Accounts in New Jersey to an account defendant GRIDIRON controlled in California.

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

COUNT TWO
(False and Fraudulent Tax Return)

1. The allegations set forth in Count One of this Information are realleged and as if fully set forth herein.
2. During the tax year 2011, defendant GRIDIRON, through the scheme and artifice to defraud described in Count One of this Information, stole approximately \$950,000 from the Worship Center and the Foundation, which money he used for his own benefit and which constituted income to defendant GRIDIRON.
3. On or about October 15, 2012, defendant GRIDIRON signed, filed, and caused to be filed with the Internal Revenue Service, an Individual Income Tax Return, Form 1040 for the 2011 tax year (the "2011 Return"). The 2011 Return was not true and correct as to every material matter, in that it failed to report the approximately \$950,000 that defendant GRIDIRON fraudulently obtained during tax year 2011 through the scheme and artifice to defraud described in Count One, upon which an additional tax of approximately \$310,000 was due and owing, which defendant GRIDIRON failed to pay.
4. The 2011 Tax Return was signed by defendant GRIDIRON and contained a written declaration that it was signed under penalties of perjury.

5. On or about October 15, 2012, in the Central District of California,
the defendant,

DONALD GRIDIRON, JR.,

did knowingly and willfully make and subscribe a 2011 U.S. Individual Income Tax Return, Form 1040, as described in paragraphs 3 and 4 of Count Two of this Information, which he did not believe to be true and correct as to every material matter, as described in paragraph 3 of Count Two of this Information.

In violation of Title 26, United States Code, Section 7206(1).

FORFEITURE ALLEGATION

1. The allegations contained in Count One of this Information are realleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.

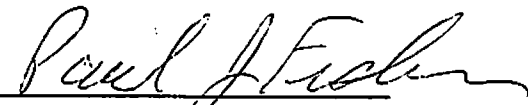
2. Upon conviction of the offense charged in Count One of this Information, defendant GRIDIRON shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, and all property traceable to such property.

3. If by any act or omission of defendant GRIDIRON any of the property subject to forfeiture herein:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by 28 U.S.C. § 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title
28, United States Code, Section 2461(c).


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

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District of New Jersey**

UNITED STATES OF AMERICA

v.

DONALD GRIDIRON, JR.

INFORMATION FOR

**18 U.S.C. § 1343 and
26 U.S.C. § 7206(1)**

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