

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 10-582-2 (WJM)
 :
 v. : 18 U.S.C. §§ 1956(h), 666(a)(1)(A), and 2
 :
 ALEXANDER MOODY : **SUPERSEDING INFORMATION**

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

COUNT 1
(Conspiracy to Commit Money Laundering)

1. At all times relevant to this Superseding Information:

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 Conspirators

d. Defendant ALEXANDER MOODY and co-conspirator Shaunette R. Moody resided in Hudson County, New Jersey.

e. Co-conspirator Shaunette R. Moody was defendant ALEXANDER MOODY's spouse and an NJCU employee and agent whose duties included acting as office manager for the SGO, with responsibility for management of the SGO financial accounts. Co-conspirator Shaunette R. Moody was not authorized to sign SGO-issued checks, however.

The Charge

2. From on or about January 4, 2007 through on or about July 21, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

ALEXANDER MOODY

did knowingly and intentionally conspire and agree with co-conspirators Shaunette R. Moody and other persons to conduct financial transactions which in fact involved the proceeds of a specified unlawful activity, namely misappropriation, theft, and embezzlement of public goods by a public official, knowing that the property involved in the financial transactions represented the proceeds of some form of specified unlawful activity, and knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code,

Section 1956(a)(1)(B)(i).

The Specified Unlawful Activity

3. While co-conspirator Shaunette R. Moody was an agent of NJCU, defendant ALEXANDER MOODY did knowingly aid and assist her to embezzle, steal, obtain by fraud, and otherwise without authority knowingly convert to the use of defendant ALEXANDER MOODY and co-conspirators Shaunette R. Moody and other persons, and 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 Title 18, United States Code, Section 666(a)(1)(A) and Section 2.

The Object of the Conspiracy

4. The principal object of the conspiracy was to steal NJCU funds, which had been deposited in SGO financial accounts, and convert those funds into U.S. currency in order to conceal the embezzled funds' nature, source, and control.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that, between January 4, 2007 and July 21, 2010, defendant ALEXANDER MOODY and co-conspirator Shaunette R. Moody caused approximately 275 unauthorized NJCU SGO checks to be issued that were payable to defendant ALEXANDER MOODY and co-conspirator Shaunette R. Moody and other persons. The total value of these checks was approximately \$502,117. The signature authorizing most or all of these checks was forged.

6. It was further part of the conspiracy that, between January 4, 2007 and July 21, 2010, defendant ALEXANDER MOODY, co-conspirator Shaunette R. Moody, and other persons negotiated the unauthorized checks for U.S. currency in order to conceal the nature,

source, and control of the embezzled funds.

7. It was further part of the conspiracy that, between January 4, 2007 and July 21, 2010, defendant ALEXANDER MOODY and co-conspirator Shaunette R. Moody, and other persons used the U.S. currency obtained from the negotiated checks in order to purchase goods and services for their personal benefit.

In violation of Title 18, United States Code, Section 1956(h).

COUNT 2

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

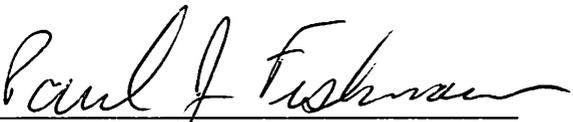
1. Paragraphs 1 and 5 through 7 of Count 1 are incorporated and realleged as if set in full herein.

2. From on or about January 4, 2007 through on or about July 21, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

ALEXANDER MOODY

aided and abetted Shaunette R. Moody, who being an agent of NJCU, embezzled, stole, obtained by fraud, and otherwise without authority knowingly converted to the use of defendant ALEXANDER MOODY, Shaunette R. Moody, and other 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 Title 18 United States Code Section 666(a)(1)(A) and Section 2.



PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: _____

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UNITED STATES OF AMERICA

v.

ALEXANDER MOODY

SUPERSEDING INFORMATION FOR

18 U.S.C. §§ 1956(h), 666(a)(1)(A), and 2

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