

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 11-  
 :  
 v. : 18 U.S.C. § 371  
 :  
 :  
 CURTIS SHEARER : **INFORMATION**

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

1. At all times relevant to this 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 the transfer of approximately \$600,000 of NJCU funds annually into SGO financial accounts.

#### The Conspirators

d. Defendant CURTIS SHEARER and co-conspirators Shaunette R. Moody, Alexander Moody, Kimberly Jackson, and Arsenio Willey resided in Hudson County, New Jersey.

e. Co-conspirator 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. Co-conspirator Shaunette R. Moody did not have signature authority for SGO-issued checks, however.

#### The Charge

2. From on or about September 30, 2009 through on or about February 1, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

CURTIS SHEARER

did knowingly and intentionally conspire and agree with co-conspirators Shaunette R. Moody, Alexander Moody, Kimberly Jackson, Arsenio Willey, and other persons to commit an offense against the United States, that is, while co-conspirator Shaunette R. Moody was an agent of NJCU, to embezzle, steal, obtain by fraud, and otherwise without authority knowingly convert to the use of defendant CURTIS SHEARER, co-conspirators Shaunette R. Moody, Alexander Moody, Kimberly Jackson, Arsenio Willey, and other persons, and to intentionally misapply,

property with a value of \$5,000 or more, that was owned by, and was under the care, custody, and 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 September 30, 2009 and on or about February 1, 2010, co-conspirators Shaunette R. Moody and Alexander Moody caused at least 26 unauthorized SGO checks to be issued, payable to defendant CURTIS SHEARER. The total value of these checks was \$59,276. The signature authorizing most or all of these checks was forged.

5. It was further part of the conspiracy that between September 30, 2009 and on or about February 1, 2010, defendant CURTIS SHEARER endorsed and negotiated the 26 unauthorized SGO checks at bank branches for U.S. currency.

#### Overt Acts

6. In furtherance of the conspiracy and in order to effect the object thereof, on or about the dates indicated below, defendant CURTIS SHEARER committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere, by endorsing and negotiating for currency the following unauthorized SGO checks:

Overt Act	Check Number	Date Posted	Amount
A	6686	9/30/09	\$2,400
B	6688	10/6/09	\$3,100
C	6689	10/7/09	\$2,950
D	6694	10/13/09	\$2,300
E	6695	10/13/09	\$2,600
F	6700	10/9/09	\$2,600
G	6706	10/14/09	\$2,400
H	6707	10/14/09	\$2,200
I	6832	1/6/10	\$2,150
J	6836	1/8/10	\$2,100
K	6837	1/8/10	\$2,500
L	6838	1/11/10	\$1,300
M	6840	1/14/10	\$2,610
N	6841	1/13/10	\$2,400
O	6842	1/14/10	\$2,300
P	6843	1/15/10	\$1,000
Q	6850	1/20/10	\$2,616
R	6851	1/7/10	\$2,300
S	6852	1/25/10	\$1,650
T	6853	1/25/10	\$2,000
U	6865	1/27/10	\$1,500
V	6866	1/26/10	\$2,500
W	6868	1/28/10	\$2,500
X	6869	1/29/10	\$2,600

Y	6874	2/1/10	\$2,100
Z	6875	2/1/10	\$2,600

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

  
\_\_\_\_\_  
PAUL J. FISHMAN  
UNITED STATES ATTORNEY

CASE NUMBER: \_\_\_\_\_

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**CURTIS SHEARER**

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**INFORMATION FOR**

18 U.S.C. § 371

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**PAUL J. FISHMAN**  
*U.S. ATTORNEY*  
*NEWARK, NEW JERSEY*

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RANDALL H. COOK  
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