

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No.: 14-
DEBBIE SHANK MORGAN : Title 18, United States Code,
Sections 1519 and 2

I N F O R M A T I O N
(Obstruction of Justice)

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

Introduction

1. At all times relevant to this Information:
 - a. Defendant Debbie Shank Morgan, a resident of Euclid, Ohio, claimed to be a non-practicing lawyer who assisted attorneys in the investigation of labor unions, employee benefit plans, and other alleged violations of criminal and civil laws.
 - b. The United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations (hereinafter "DOL-OIG"), was an agency of the executive branch of the United States and empowered to investigate violations of federal law, including violations associated with labor unions and employee benefit plans.

Defendant Morgan's False Allegations

2. Beginning in or around May 2012, defendant Debbie Shank Morgan contacted the DOL-OIG in New Jersey and reported that she had information concerning criminal activities allegedly committed by current and former officers of an international labor union and its associated local unions. In particular, defendant Debbie Shank Morgan reported that a former officer of an international labor union (hereinafter the "Former Union Officer") had embezzled at least \$30 million from a Political Action Committee ("PAC") associated with the international union. Furthermore, defendant Debbie Shank Morgan reported to the DOL-OIG that an individual (hereinafter the "Alleged Shooter"), who was acting at the direction of another union officer, fired a weapon at her car while she was driving it in Ohio. Based on defendant Debbie Shank Morgan's allegations, the New Jersey office of the DOL-OIG commenced a federal criminal investigation.

3. In support of her allegations, defendant Debbie Shank Morgan provided the DOL-OIG with tangible items that she claimed were evidence of the alleged criminal offenses described in paragraph two above. In truth and in fact, these allegations were false. Defendant Debbie Shank Morgan fabricated these allegations, and she manufactured false evidence in support of her untrue allegations. For example, defendant Debbie Shank Morgan: (a) created numerous fictitious text messages allegedly between herself and the Former Union Officer concerning his alleged involvement in embezzling money from the

PAC; (b) created and altered fictitious e-mails of alleged communications with others; and (c) fabricated two audio recordings, purporting them to be consensual recordings containing admissions made on behalf of the Alleged Shooter.

The Charge

4. From in or about May 2012 through on or about February 6, 2013, in Union County, in the District of New Jersey and elsewhere, defendant

Debbie Shank Morgan

knowingly altered, concealed, covered up, falsified, and made false entries in records, documents, and tangible objects with the intent to impede, obstruct, and influence an investigation and the proper administration of any matter within the jurisdiction of an agency and department of the United States, namely, the United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations.

In violation of Title 18, United States Code, Section 1519 and Title 18, United States Code, Section 2.

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

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UNITED STATES OF AMERICA

v.

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INFORMATION FOR

Title 18, United States Code, Sections 1519 & 2

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