

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 11-
 :
 v. : 18 U.S.C. § 371
 :
 :
 KIMBERLY JACKSON : **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 KIMBERLY JACKSON and co-conspirators Shaunette R. Moody, Alexander Moody, Curtis Shearer, 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 May 7, 2007 through on or about June 25, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

KIMBERLY JACKSON

did knowingly and intentionally conspire and agree with co-conspirators Shaunette R. Alexander Moody, Curtis Shearer, 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 KIMBERLY JACKSON, co-conspirators Shaunette R. Moody, Alexander Moody, Curtis Shearer, 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 May 7, 2007 and June 25, 2010, co-conspirators Shaunette R. Moody and Alexander Moody caused at least 18 unauthorized SGO checks to be issued, payable to defendant KIMBERLY JACKSON. The total value of these checks was \$36,201.42. The signature authorizing most or all of these checks was forged.

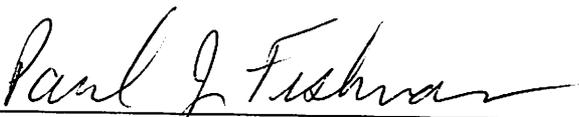
5. It was further part of the conspiracy that between May 7, 2007 and June 25, 2010, defendant KIMBERLY JACKSON endorsed and negotiated the 18 unauthorized SGO checks at bank branches for U.S. currency.

Overt Acts

6. In furtherance of the conspiracy and in order to effect the object thereof, on or about the dates indicated below, defendant KIMBERLY JACKSON 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 | 5591 | 5/7/07 | \$1,800 |
| B | 5645 | 5/30/07 | \$1,850 |
| C | 5649 | 6/5/07 | \$1,800 |
| D | 5670 | 6/27/07 | \$1,500 |
| E | 5678 | 7/6/07 | \$2,064 |
| F | 5684 | 7/17/07 | \$2,100 |
| G | 5748 | 9/20/07 | \$1,102 |
| H | 5840 | 11/2/07 | \$1,584 |
| I | 6509 | 3/30/09 | \$2,600 |
| J | 6666 | 9/2/09 | \$2,550 |
| K | 6670 | 9/10/09 | \$2,400 |
| L | 6676 | 9/18/09 | \$2,350 |
| M | 6681 | 9/22/09 | \$2,250 |
| N | 6725 | 12/11/09 | \$2,725 |
| O | 6792 | 12/14/09 | \$1,100 |
| P | 6958 | 4/13/10 | \$2,125 |
| Q | 7085 | 5/20/10 | \$2,200 |
| R | 7094 | 6/25/10 | \$2,100 |

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


 PAUL J. FISHMAN
 UNITED STATES ATTORNEY

CASE NUMBER: _____

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UNITED STATES OF AMERICA

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INFORMATION FOR

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