

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Esther Salas

v. : Crim. No. 20-194 (ES)

SHENANDOAH ADAMS SR., a/k/a : 18 U.S.C. § 1012 and § 2
“SHANE ADAMS SR.”

I N F O R M A T I O N

The United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:
 - A. Defendant SHENANDOAH ADAMS SR., a/k/a “Shane Adams Sr.” was a principal of VH Electrical & Plumbing (“VH”).
 - B. The Orange Public Library (the “Library”) served the residents of the City of Orange Township (“Orange”), New Jersey.
 - C. The U.S. Department of Housing and Urban Development (“HUD”) was a department of the Executive Branch of the U.S. Government. HUD sponsored a Community Development Block Grant (“CDBG”) program to disburse grants for local communities to address a range of housing and development issues.
 - D. Essex County (the “County”) in Northeast New Jersey was a local government that administered all county business, including the receipt and disbursement of CDBG funds received from HUD.

2. In or about March 2015, ADAMS intentionally employed fraudulent means to induce the Library to pay VH and to obtain CDBG funds from the County for work that ADAMS never performed, as detailed below:

A. In or about September 2014, Orange and the Library agreed with the County to accept \$48,000 in CDBG funds to replace the Library's HVAC/Chiller unit (the "Chiller Replacement Project").

B. On or about March 11, 2015, ADAMS, on behalf of VH, signed an agreement with the Library for VH to replace the Library's Chiller for \$49,000.

C. On or about March 26, 2015, ADAMS sent and caused to be sent to a Library representative a \$33,875 quotation that included the price for a new Chiller unit to give the false impression that defendant ADAMS was taking steps to replace the Library's Chiller.

D. On or about March 30, 2015, ADAMS caused the Library to submit a voucher and supporting documentation (including the quotation for the Chiller) to the County in order to obtain \$30,000 of CDBG funds for the Chiller Replacement Project.

E. ADAMS never replaced the Library's Chiller, despite having received \$40,000 from the Library to do so.

3. In or about March 2015, in the District of New Jersey and elsewhere, defendant

**SHENANDOAH ADAMS SR.,
a/k/a "SHANE ADAMS SR.,"**

knowingly and with intent to defraud, did make, and cause to be made, false reports and statements to and for HUD in connection with the Chiller Replacement Project, as set forth in Paragraph 2 above.

In violation of Title 18, United States Code, Section 1012 and Section 2.

Philip R. Sellinger /rs

PHILIP R. SELLINGER
UNITED STATES ATTORNEY