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**SUPERIOR COURT
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ598-10-5

Superior Court
Docket Number 10-12-00106-S

STATE OF NEW JERSEY)	
v.)	INDICTMENT
SHAUNETTE RUFFIN-MOODY)	
and)	
ALEX A. MOODY)	

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

SHAUNETTE RUFFIN-MOODY

and

ALEX A. MOODY

who are named as defendants herein, and other persons, whose
identities are both known and unknown to the Grand Jurors, who
are coconspirators but not named as defendants herein, between on
or about May 7, 2007 and on or about July 8, 2010, at the City of
Jersey City, in the County of Hudson, elsewhere, and within the
jurisdiction of this Court, with the purpose of promoting the

crimes of official misconduct, theft by deception and forgery did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or

B. One or more of them would aid in the planning, attempt, solicitation or commission of said crimes, that is:

1. Official Misconduct, in that one or more of them, being a public servant, would, acting with the purpose to obtain a benefit for herself or another, or to injure or deprive another of a benefit in excess of \$200, commit acts relating to her office, constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, and the said SHAUNETTE RUFFIN-MOODY then and there being a public servant, to wit: the Office Manager of the Student Government Organization of the New Jersey City University, having been charged with the official functions and duties, among others, to monitor the expenses and budget of the Student Government Organization of the New Jersey City University, to maintain a checking account on behalf of the Student Government Organization of the New Jersey City University, from which would be paid the legitimate and duly authorized expenses of the Student Government Organization of the New Jersey City University, to perform her duties in a legal and

proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, would, without proper authorization, knowingly issue checks drawn on the bank account of the Student Government Organization of the New Jersey City University to herself or other unauthorized persons, either directly or indirectly, including the said ALEX A. MOODY, having a value in excess of \$200, to wit: in excess of \$485,000, contrary to the provisions of N.J.S.A. 2C:30-2a;

2. Theft by Deception, in that one or more of them would purposely obtain from the New Jersey City University, monies from the Student Government Organization having a value of approximately \$485,000, by deception, by creating or reinforcing the false impression that numerous checks drawn on a Bank of America bank account maintained in the name of the Student Government Organization of the New Jersey City University were issued in payment of legitimate and proper expenses of the Student Government Organization of the New Jersey City University and were authorized by the Associate Dean of Students of New Jersey City University, contrary to the provisions of N.J.S.A. 2C:20-4a; and

3. Forgery, in that one or more of them would, with the purpose to defraud or injure the Student Government Organization of the New Jersey City University, or with the knowledge they were facilitating a fraud or injury to be perpetrated by anyone,

knowingly execute checks, drawn on the Bank of America bank account of the Student Government Organization of the New Jersey City University, payable to various unauthorized persons, so that they purported to be the acts of the Associate Dean of Students of New Jersey City University, who did not authorize said acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2).

Among the means by which the aforesaid conspirators would carry out the conspiracy are the following:

It was part of the conspiracy that the said SHAUNETTE RUFFIN-MOODY, in her role as a public servant, that is, the Office Manager of the Student Government Organization of the New Jersey City University, did monitor the expenses and budget of the Student Government Organization of the New Jersey City University, and did, without proper authorization, issue checks drawn on the bank account of the Student Government Organization of the New Jersey City University to herself or other unauthorized persons, either directly or indirectly, including the said ALEX A. MOODY.

It was further part of the conspiracy that the said ALEX A. MOODY did cash checks unlawfully received from the said SHAUNETTE RUFFIN-MOODY and drawn on the bank account of the Student Government Organization of the New Jersey City University, and did give other checks, drawn on the bank account of the Student Government Organization of the New Jersey City University and

unlawfully received from the said SHAUNETTE RUFFIN-MOODY, to other unauthorized persons.

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

SHAUNETTE RUFFIN-MOODY

and

ALEX A. MOODY

between on or about May 7, 2007 and on or about July 8, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did commit the offense of Official Misconduct, in that the said SHAUNETTE RUFFIN-MOODY, a public servant, acting with the purpose to obtain a benefit for herself or another, or to injure or deprive another of a benefit in excess of \$200, did commit acts relating to her office, constituting unauthorized exercises of her official functions, knowing that such acts were unauthorized or that she was committing them in an unauthorized manner, and the said SHAUNETTE RUFFIN-MOODY then and there being a public servant, to wit: the Office Manager of the Student Government Organization of the New Jersey City University, having been charged with the official functions and duties, among others, to monitor the expenses and budget of the Student Government Organization of the New Jersey City University, to maintain a checking account on behalf of the Student Government Organization of the New Jersey City University, from which would be paid the legitimate and duly authorized expenses of the Student Government Organization of the

New Jersey City University, to perform her duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did, without proper authorization, knowingly issue checks drawn on the bank account of the Student Government Organization of the New Jersey City University to herself or other unauthorized persons, either directly or indirectly, including the said ALEX A. MOODY, having a value in excess of \$200, to wit: in excess of \$485,000, contrary to the provisions of N.J.S.A. 2C:30-2a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Second Degree)

SHAUNETTE RUFFIN-MOODY

and

ALEX A. MOODY

between on or about May 7, 2007 and on or about July 8, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, purposely did obtain from the New Jersey City University, monies from the Student Government Organization having a value of approximately \$485,000, by deception, by creating or reinforcing the false impression that numerous checks drawn on a Bank of America bank account maintained in the name of the Student Government Organization of the New Jersey City University were issued in payment of legitimate and proper expenses of the Student Government Organization of the New Jersey City University and were authorized by the Associate Dean of Students of New Jersey City University, contrary to the provisions of N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Forgery - Third Degree)

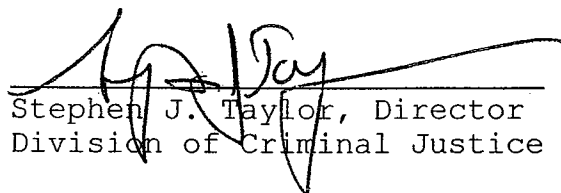
SHAUNETTE RUFFIN-MOODY

and

ALEX A. MOODY

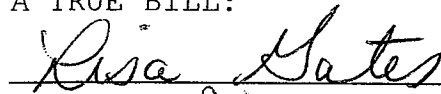
between on or about May 7, 2007 and on or about July 8, 2010, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did, with the purpose to defraud or injure the Student Government Student Government Organization of the New Jersey City University, or with the knowledge they were facilitating a fraud or injury to be perpetrated by anyone, knowingly execute checks, drawn on the Bank of America bank account of the Student Government Organization of the New Jersey City University, payable to various unauthorized persons, so that they purported to be the acts of the Associate Dean of Students of New Jersey City University, who did not authorize said acts, contrary to the provisions of N.J.S.A. 2C:21-1a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of

the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Acting, Foreperson

Dated: 12-1-10

FILED

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**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ598-10-5

Superior Court

Docket Number 10-12-00166-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

SHAUNETTE RUFFIN-MOODY)

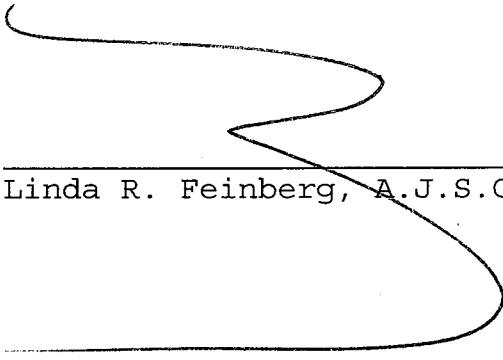
and)

ALEX A. MOODY)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of December, 2010, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Hudson be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Hudson for filing.



Linda R. Feinberg, A.J.S.C.