UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No.
v.	:	18 U.S.C. §§ 1343 & 2
ERIC D. HURT	:	INFORMATION

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

(Wire Fraud)

1. At all times relevant to this Information, defendant ERIC D. HURT was employed as the Business Manager for the Montessori Day School of Brooklyn (hereinafter, the "School") in Brooklyn, New York. As the Business Manager, defendant HURT was responsible for, among other things: (A) assisting in administering the School's employees' payroll, and interfacing with a payroll company located in Piscataway, New Jersey (hereinafter, the "Payroll Company") and (B) conducting bank transactions for the School, including transferring funds online and electronically among the School's accounts. Defendant HURT'S annual salary was approximately $56,000. Defendant HURT resided in Jersey City, New Jersey.

2. From in or about January 2005 to in or about August 2006, in Middlesex County, in the District of New Jersey and elsewhere, defendant

ERIC D. HURT

knowingly and willfully did devise and intend to devise a scheme and artifice to defraud and for obtaining from the School money and property by means of materially false and fraudulent pretenses, representations and promises.

3. The object of the scheme and artifice to defraud was to obtain at least approximately $150,000 from the School for the personal benefit of defendant ERIC D. HURT without the School's knowledge and authorization.

4. It was a part of the scheme and artifice to defraud that, between in or about January 2005 and in or about August 2006, defendant ERIC D. HURT issued salary and bonus payments to himself from the School well in excess of his authorized salary; made unauthorized wire transfers of money from a School bank account to himself; and used the School's Automatic Teller Machine ("ATM") card to make unauthorized cash withdrawals from a School bank account for defendant HURT'S personal benefit.

5. It was further a part of the scheme and artifice to defraud that defendant ERIC HURT, from his Office at the School in Brooklyn, would telephone representatives of the Payroll Company in Piscataway, New Jersey to issue salary and bonus

payments to himself in amounts far in excess of his authorized payroll amount.

6. It was further a part of the scheme and artifice to defraud that defendant HURT concealed this misappropriation of funds from his superiors at the School.

7. On or about July 24, 2006, for the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant

ERIC D. HURT

knowingly and willfully transmitted and caused to be transmitted from New York to Piscataway, New Jersey by means of wire, radio and television communication a writing, sign, signal, picture and sound--namely, defendant HURT'S request for an unauthorized gross salary payment of approximately $15,000 to himself, which caused the Payroll Company, in turn, to issue to defendant HURT a net salary payment of approximately $13,330.

In violation of Title 18, United States Code, Sections 1343 and 2.

CHRISTOPHER J. CHRISTIE
UNITED STATES ATTORNEY

CASE NUMBER: 06-_____

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INFORMATION FOR

Title 18, United States Code, Sections 1343 & 2

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