



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ORIGINAL

UNITED STATES OF AMERICA,

Plaintiff,

vs.

D-1 TIA'VON MOORE-PATTON,

Defendant.

Case:2:16-cr-20216
Judge: Lawson, David M.
MJ: Grand, David R.
Filed: 03-29-2016 At 09:35 AM
INFO USA V TIA'VON MOORE-PATTO
N (LG)

VIOLATIONS:
18 U.S.C. § 371 (Conspiracy)
18 U.S.C. § 666 (Bribery)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. Detroit Public Schools ("DPS") was a government agency operating within Wayne County, Michigan, in the Eastern District of Michigan.

2. DPS was a government agency that received in excess of \$10,000.00 under one or more federal programs involving grants, contracts, subsidies, loans, guarantees, insurance and other forms of federal assistance in each one-year period for fiscal years 2011 through 2014.

3. Defendant TIA'VON MOORE-PATTON was an employee and agent of DPS, a government agency, when she was employed as Principal of Jerry L. White Center High School (JLWCHS) from 2008 through the present.

4. As Principal, MOORE-PATTON had the primary authority for ordering school supplies for JWCHS. MOORE-PATTON also had the primary authority for selecting vendors from whom she would order supplies for JLWCHS.

5. As Principal, MOORE-PATTON was responsible for certifying that JLWCHS received the goods listed on a vendor's invoice, and then submitting, and causing to be submitted, the invoice to DPS for payment to the vendor.

6. Beginning in 2008, MOORE-PATTON chose Norman Shy, doing business as Allstate Sales ("Shy"), as a vendor of school supplies for JLWCHS.

COUNT ONE

(18 U.S.C. §§ 371, 666(a)(1)(B) –
Conspiracy to Commit Federal Program Bribery)

7. Paragraphs 1 through 6 of the General Allegations are hereby incorporated in this Count.

8. From in or about January 2011 through approximately June 2014, in the Eastern District of Michigan, defendant TIA'VON MOORE-PATTON and Shy, did knowingly and willfully conspire and agree with each other for MOORE-PATTON, an agent of DPS, to corruptly accept things of value, to wit: kickback payments, intending to be influenced and rewarded in connection with a series of payments

from DPS to Shy's business, which payments were valued at more than \$5,000, in violation of Title 18, United States Code, Section 666(a)(1)(B).

Manner and Means of the Conspiracy

9. The conspiracy was carried out through the following manner and means:

10. MOORE-PATTON promised to and did take official action, including ordering school supplies from Shy, and certifying and submitting, and causing to be certified and submitted, fraudulent invoices to DPS for payment to Shy for goods that were not delivered, in exchange for kickback payments from Shy.

11. At times, Shy did not deliver any of the goods to JLWCHS that were listed on the fraudulent invoices that MOORE-PATTON certified and submitted, and caused to be certified and submitted, to DPS for payment.

12. At other times, Shy delivered only a portion of the goods specified on an invoice for the purpose of making the transaction appear legitimate.

13. Shy maintained a ledger to keep track of how much money Shy owed MOORE-PATTON in kickback payments as a result of the fraudulently submitted invoices.

14. MOORE-PATTON regularly met and communicated with Shy to discuss how much money Shy owed her, and to request and receive kickback

payments in connection with the fraudulent invoices she submitted, and caused to be submitted, to DPS.

15. MOORE-PATTON corruptly received things of value, i.e., prepaid gift cards, from Shy, which represented a portion of the payments Shy received from DPS as a result of the fraudulent invoices MOORE-PATTON submitted and caused to be submitted.

16. At Shy's direction, MOORE-PATTON provided Shy with written requests for gift cards on school letterhead, which falsely stated that the gift cards were for school purposes, for the purpose of making the illicit payments appear legitimate.

Overt Acts Which Furthered the Conspiracy

17. In order to further the unlawful conspiracy, one or more of the conspirators committed the following acts, among others:

18. Sometime prior to November 2010, MOORE-PATTON selected Shy as the vendor to provide school supplies to JLWSHS.

19. Sometime prior to January 2011, Shy described to MOORE-PATTON how they could fraudulently "encumber" DPS funds by certifying and submitting to DPS, and causing to be certified and submitted, invoices from Shy for goods that were not delivered.

20. Sometime prior to January 2011, Shy further described that he could provide MOORE-PATTON prepaid gift cards which would represent her portion of the encumbered funds which Shy fraudulently received from DPS for the undelivered goods.

21. Beginning in at least January 2011, in exchange for kickback payments from Shy, MOORE-PATTON agreed to submit and cause to be submitted to DPS fraudulent invoices from Shy for goods that were not delivered to JLWCHS.

22. From at least January 2011 through in and around April 2014, MOORE-PATTON certified and submitted, and caused to be certified and submitted, fraudulent invoices from Shy on behalf of JLWCHS which caused DPS to issue payments to Shy for goods that were never delivered.

23. On the following approximate dates, among others, at Shy's direction, MOORE-PATTON provided Shy with a letter on JLWCHS letterhead requesting a gift card in order to make the kickback payment from Shy appear legitimate:

- a. January 14, 2011
- b. March 7, 2011
- c. May 25, 2011
- d. February 3, 2012
- e. May 14, 2012
- f. June 25, 2014


24. On the following approximate dates, among others, MOORE-PATTON accepted kickback payments in the form of prepaid gift cards from Shy:


| | Approximate Date | Amount of Kickback |
|----|-------------------------|---------------------------|
| a. | January 14, 2011 | \$500 |
| b. | March 7, 2011 | \$1,000 |
| c. | May 25, 2011 | \$1,000 |
| d. | February 3, 2012 | \$500 |
| e. | May 14, 2012 | \$500 |
| f. | June 25, 2014 | \$500 |

25. From January 2011 through June 2014, MOORE-PATTON accepted kickback payments from Shy totaling approximately \$4,000.

All in violation of Title 18, United States Code, Sections 371 and 666.

BARBARA L. McQUADE
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Dated: March 29, 2016

United States District Court
Eastern District of Michigan

Criminal Case Cover

Case: 2:16-cr-20216
Judge: Lawson, David M.
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

| | |
|--|-------------------------------------|
| Companion Case Information | Companion Case Number: See attached |
| This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : | Judge Assigned: See attached |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | AUSA's Initials: <i>JMB</i> |

Case Title: USA v. D-1 TIA'VON MOORE-PATTON

County where offense occurred : Wayne

Check One: Felony Misdemeanor Petty

- Indictment/ Information --- no prior complaint.
- Indictment/ Information --- based upon prior complaint [Case number: _____]
- Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

| | | |
|-----------------------|----------------|--|
| <u>Defendant name</u> | <u>Charges</u> | <u>Prior Complaint (if applicable)</u> |
|-----------------------|----------------|--|

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 29, 2016
Date

Michael Buckley

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.

Companion Case Information

Companion Case Number and Judge Unknown; all cases filed simultaneously on March 29, 2016:

U.S. v. Ronald Alexander

U.S. v. Tanya Bowman

U.S. v. Josette Buendia

U.S. v. Beverly Campbell

U.S. v. Nina Graves-Hicks

U.S. v. James Hearn

U.S. v. Gerlma Johnson

U.S. v. Stanley Johnson

U.S. v. Willye Pearsall

U.S. v. Norman Shy and Clara Flowers

U.S. v. Ronnie Sims

U.S. v. Clara Smith