

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**ORIGINAL**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

D-1 RONALD ALEXANDER,

Defendant.

Case:2:16-cr-20208  
Judge: Roberts, Victoria A.  
MJ: Majzoub, Mona K.  
Filed: 03-29-2016 At 09:00 AM  
INFO USA V RONALD ALEXANDER (BG)

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 2009 through 2014.

3. Defendant RONALD ALEXANDER was an employee and agent of DPS, a government agency, when he was employed as Principal of Charles L. Spain Elementary-Middle School (“Spain Elementary”) from approximately 1996 through the present.

4. As Principal, ALEXANDER had the primary authority for ordering school supplies for Spain Elementary. ALEXANDER also had the primary authority for selecting vendors from whom he would order supplies for Spain Elementary.

5. As Principal, ALEXANDER was responsible for certifying that Spain Elementary received the goods listed on a vendor’s invoice, and then submitting, or causing to be submitted, the invoice to DPS for payment to the vendor.

6. Beginning in at least May 2009, ALEXANDER chose Norman Shy, doing business as Allstate Sales (“Shy”), as a vendor of school supplies for Spain Elementary.

**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 May 2009 through June 2014, in the Eastern District of Michigan, defendant RONALD ALEXANDER and Shy, did knowingly and willfully conspire and agree with each other for ALEXANDER, 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. ALEXANDER 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 to ALEXANDER from Shy.

11. At times, Shy did not deliver any of the goods to Spain Elementary that were listed on the fraudulent invoices that ALEXANDER 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 ALEXANDER in kickback payments as a result of the fraudulently submitted invoices.

14. ALEXANDER regularly communicated and met with Shy to discuss how much money Shy owed him, and to request and receive kickback payments in connection with the fraudulent invoices ALEXANDER submitted, and caused to be submitted, to DPS.

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

16. At Shy's direction, ALEXANDER 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 May 2009, ALEXANDER selected Shy as the vendor to provide school supplies to Spain Elementary.

19. Sometime prior to May 2009, Shy described to ALEXANDER how they could fraudulently "encumber" DPS funds by certifying and submitting, and causing to be certified and submitted, to DPS invoices from Shy for goods that were not delivered.

20. Sometime prior to May 2009, Shy further described that he could provide ALEXANDER kickback payments which would represent ALEXANDER's portion of the encumbered funds which Shy fraudulently received from DPS for the undelivered goods.

21. Beginning in at least May 2009, in exchange for kickback payments from Shy, ALEXANDER agreed to submit and cause to be submitted to DPS fraudulent invoices from Shy for goods that were not delivered to Spain Elementary.

22. From at least May 2009 through June 2014, ALEXANDER certified and submitted, and caused to be certified and submitted, fraudulent invoices from Shy on behalf of Spain Elementary 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, ALEXANDER provided Shy with a letter on Spain Elementary letterhead either requesting gift cards or thanking Shy for monetary contributions or gift cards:

- a. February 25, 2010
- b. January 12, 2011
- c. April 8, 2011

24. On the following approximate dates, among others, ALEXANDER accepted kickback payments from Shy:

	<b>Approximate Date</b>	<b>Amount of Kickback</b>
a.	May 8, 2009	\$2,624.85
b.	June 25, 2009	\$816.48
c.	March 10, 2014	\$3,984

25. From May 2009 through June 2014, ALEXANDER accepted kickback payments from Shy totaling approximately \$23,000.

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

BARBARA L. McQUADE  
United States Attorney



J. MICHAEL BUCKLEY  
Assistant United States Attorney  
Deputy Chief, Public Corruption Unit



FRANCES LEE CARLSON  
Assistant United States Attorney  
Public Corruption Unit  
211 W. Fort St., Ste. 2001  
Detroit, MI 48226  
313-226-9100

Dated: March 29, 2016

Case: 2:16-cr-20208

Judge: Roberts, Victoria A.

MJ: Majzoub, Mona K.

Filed: 03-29-2016 At 09:00 AM

INFO USA V RONALD ALEXANDER (BG)

United States District Court  
Eastern District of Michigan

**Criminal Case Cover**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

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

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

Case Title: USA v. D-1 RONALD ALEXANDER

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*  
 J. MICHAEL BUCKLEY  
 Assistant United States Attorney  
 211 W. Fort Street, Suite 2001  
 Detroit, MI 48226-3277  
 Phone: 313-226-9581  
 Fax: 313-226-3413  
 E-Mail address: Michael.Buckley@usdoj.gov  
 Attorney Bar #: P36167

<sup>1</sup> 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. 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. Tia'Von Moore-Patton**

**U.S. v. Willye Pearsall**

**U.S. v. Norman Shy and Clara Flowers**

**U.S. v. Ronnie Sims**

**U.S. v. Clara Smith**