

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

UNITED STATES OF AMERICA	:	Criminal No. 18-
	:	
v.	:	18 U.S.C. § 1952(a)(3)
	:	18 U.S.C. § 2
LIZAIDA CAMIS	:	18 U.S.C. § 371

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges that:

COUNT 1
(Use of the Mails to Promote a Voter Bribery Scheme)

Introduction

1. At all times relevant to Count 1 of this Indictment:
 - a. Defendant LIZAIDA CAMIS (“CAMIS”) was a resident of Hoboken, New Jersey.
 - b. Voter 1, Voter 2, Voter 3, Voter 4, Voter 5, and Voter 6 (collectively the “Voters”) all resided in Hoboken and were registered to vote in Hoboken.
 - c. Candidate 1 was a candidate for the Hoboken City Council who was on the ballot for the November 5, 2013 municipal election in Hoboken (the “November 5 Election”).
 - d. Candidate 1 was running as part of a slate that included other candidates for Hoboken City Council and a candidate for Hoboken Mayor (the “Slate”).

e. Under New Jersey law, a registered voter was permitted to cast a ballot by mail rather than in person. In Hudson County, where Hoboken is located, to receive a mail-in ballot, a voter completed and submitted to the Hudson County Clerk's Office ("Clerk's Office") an Application for Vote By Mail Ballot ("VBM Application"). After the VBM Application was accepted by the Clerk's Office, the voter received through either the U.S. mail or by hand delivery a mail-in ballot, a Certificate of Mail-in Voter, and a ballot envelope.

2. Between in or about October 2013 and in or about November 2013, CAMIS schemed to pay the Voters if those voters applied for and cast mail-in ballots for the November 5 Election.

3. For example, in or about October 2013, CAMIS promised Voter 1 that Voter 1 would receive a \$50 check in exchange for submitting a mail-in ballot. First, CAMIS gave Voter 1 a VBM Application, which Voter 1 completed and returned to CAMIS. CAMIS then caused Voter 1's VBM Application to be delivered to the Clerk's Office. Next, Voter 1 then received a mail-in ballot in the U.S. mail. CAMIS visited Voter 1 at Voter 1's Hoboken apartment, told Voter 1 to vote for Candidate 1 and the Slate, and took Voter 1's completed mail-in ballot. CAMIS told Voter 1 to pick up the promised check after the November 5 Election from an office located in Hoboken (the "Office").

4. Shortly after the November 5 Election, Voter 1 went to the Office and collected a \$50 check, as directed by CAMIS. Voter 1 did not do any work for any campaign during the 2013 election cycle.

5. Between in or about October 2013 and in or about November 2013, in Hudson County, in the District of New Jersey, and elsewhere, defendant

LIZAIDA CAMIS

knowingly and intentionally used and caused to be used the mail with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, bribery, contrary to N.J.S.A. §§ 2C:27-2(a) and 19:34-25(a), and thereafter caused to be performed and attempted the performance of an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of the unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3) and Section 2.

COUNT 2
(Conspiracy to Use the Mails to Promote a Voter Bribery Scheme)

1. Paragraphs 1 to 4 of Count 1 of this Indictment are hereby incorporated and realleged as if fully set forth herein.

2. From at least in or about October 2013 to at least in or about November 2013, in Hudson County, in the District of New Jersey, and elsewhere, defendant

LIZAIDA CAMIS

knowingly and intentionally combined, conspired, confederated, and agreed with others to commit an offense against the United States, that is, to knowingly and intentionally use the mail with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, bribery, contrary to N.J.S.A. §§ 2C:27-2(a) and 19:34-25(a), and thereafter perform and attempt to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of the unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

Goal of the Conspiracy

3. The goal of the conspiracy was to bribe voters by paying them to apply for and cast mail-in ballots in support of Candidate 1 and the Slate.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that CAMIS promised each of the

Voters that they would be paid approximately \$50 by check if they submitted a mail-in ballot for the November 5 Election.

5. It was further part of the conspiracy that CAMIS gave each of the Voters VBM applications and caused their completed VBM Applications to be delivered to the Clerk's Office.

6. It was further part of the conspiracy that some of the Voters received mail-in ballots via U.S. mail.

7. It was further part of the conspiracy that CAMIS visited each of the Voters at their respective residences in Hoboken and told them to vote for Candidate 1 and the Slate.

8. It was further part of the conspiracy that CAMIS told each of the Voters to pick up their \$50 checks after the November 5 Election at the Office.

Overt Acts

9. In furtherance of the conspiracy and in order to effect its object, CAMIS and her co-conspirators committed or caused the commission of the following overt acts in the District of New Jersey and elsewhere:

a. In or about October 2013, in Hoboken, CAMIS gave Voter 4 a VBM Application.

b. In or about October 2013, in Hoboken, CAMIS caused the VBM Application of Voter 5 to be delivered to the Clerk's Office.

c. In or about October 2013, in Hoboken at Voter 6's residence, after a mail-in ballot arrived at Voter 6's residence via U.S. mail, CAMIS

instructed Voter 6 to vote for Candidate 1 and the Slate.

d. In or about November 2013, in Hoboken, at CAMIS's and her co-conspirators' direction, Voter 1 was given a \$50 check at the Office.

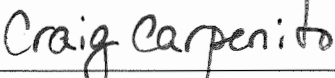
e. In or about November 2013, in Hoboken, at CAMIS's and her co-conspirators' direction, Voter 2 was given a \$50 check at the Office.

f. In or about November 2013, in Hoboken, at CAMIS's and her co-conspirators' direction, Voter 3 was given a \$50 check at the Office.

In violation of Title 18, United States Code, Section 371.

A TRUE BILL

FOREPERSON



CRAIG CARPENITO
UNITED STATES ATTORNEY