

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 10-
 :
 v. : 18 U.S.C. §§ 981(a)(1)(C) and
 : 1951(a); 28 U.S.C. § 2461
 :
 PETER CAMMARANO III : I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Conspiracy to Obstruct Commerce by Extortion
under Color of Official Right

1. At all times relevant to this Information, defendant PETER CAMMARANO III was an at-large Councilman for the City of Hoboken, New Jersey ("Hoboken") and candidate for the position of Mayor of Hoboken. On or about May 12, 2009, as one of the two top vote getters, defendant PETER CAMMARANO III qualified for a run-off election for the mayoral position. On or about June 9, 2009, defendant PETER CAMMARANO III was elected Mayor of Hoboken and was sworn in on or about July 1, 2009. Defendant PETER CAMMARANO III previously was elected to the Hoboken City Council in 2005.

2. At all times relevant to this Information, Michael Schaffer was a Commissioner on the North Hudson Utilities Authority ("NHUA") and an associate of defendant PETER CAMMARANO

III.

3. At all times relevant to this Information, Edward Cheatam was the affirmative action officer for Hudson County and a Commissioner on the Jersey City Housing Authority. At certain times relevant to this Information, Edward Cheatam was also the Vice President of the Jersey City Board of Education.

4. At all times relevant to this Information, there was an individual, now deceased, who owned and operated a consulting firm based in Jersey City (the "Consultant").

5. At all times relevant to this Information, there was a cooperating witness (the "CW") who, at the direction of the Federal Bureau of Investigation ("FBI"), held himself out to be a real estate developer interested in development in the greater Hoboken area. The CW represented that the CW did business in numerous states, including New York and New Jersey, and that the CW paid for goods and services in interstate commerce.

6. From in or about April 2009 to in or about July 2009, in Hudson County, in the District of New Jersey and elsewhere, defendant

PETER CAMMARANO III

did knowingly and willfully conspire and agree with Michael Schaffer, Edward Cheatam, the Consultant and others to obstruct, delay and affect interstate commerce by extortion under color of official right - that is, by obtaining illicit cash campaign

contributions that were paid and to be paid by another, with that person's consent, in exchange for defendant PETER CAMMARANO III's future official assistance, action and influence in Hoboken Government matters.

7. It was the object of the conspiracy that defendant PETER CAMMARANO III accepted and agreed to accept illicit cash campaign contributions from the CW in exchange for defendant PETER CAMMARANO III's future official assistance, action and influence in Hoboken Government matters pertaining to the CW's real-estate development projects.

8. It was part of the conspiracy that defendant PETER CAMMARANO III accepted a total of approximately \$25,000 (\$5,000 on or about April 27, 2009, \$5,000 on or about May 8, 2009, \$5,000 on or about May 19, 2009, and \$10,000 on or about July 16, 2009) in illicit cash campaign contributions from the CW, which were paid to defendant PETER CAMMARANO III through Michael Schaffer, Edward Cheatam and the Consultant, in exchange for defendant PETER CAMMARANO III's future official assistance, action, and influence in Hoboken Government matters pertaining to the CW's real-estate development projects.

In violation of Title 18, United States Code, Section 1951(a).

Forfeiture Allegation

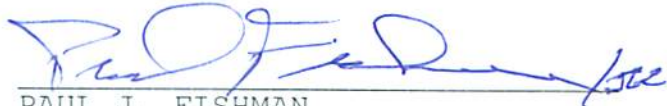
As the result of committing the aforementioned offense in violation of Title 18, United States Code, Section 1951(a), as alleged in this Information, defendant PETER CAMMARANO III shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to, approximately \$25,000 in United States currency, in that such sum constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of conspiracy to obstruct commerce by extortion under color of official right.

If any of the above-described forfeitable property, as a result of any act or omission of defendant PETER CAMMARANO III:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendant PETER CAMMARANO III up to the value of the above forfeitable property.

In violation of Title 18, United States Code, Section
981(a)(1)(C) and Title 28, United States Code, Section 2461.



PAUL J. FISHMAN
United States Attorney

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UNITED STATES OF AMERICA

v.

PETER CAMMARANO III

INFORMATION

**18 U.S.C. §§ 981(a)(1)(C) and 1951(a);
28 U.S.C. § 2461**

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