

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

UNITED STATES OF AMERICA	:	Crim. No. 19-
	:	
v.	:	18 U.S.C. §§ 1952(a)(3) and 2
	:	
MATTHEW CALICCHIO	:	
	:	

INFORMATION

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

1. At all times relevant to this Information, unless otherwise indicated:

A. Defendant MATTHEW CALICCHIO (“CALICCHIO”) resided in Hoboken, New Jersey.

B. Francis Raia (“Raia”) was a candidate for the Hoboken City Council and was on the ballot for the November 5, 2013 municipal election in Hoboken (the “2013 Election”). Raia ran as part of a slate that included other candidates for Hoboken City Council and a candidate for Hoboken Mayor (the “Slate”). Raia also was the Chairperson of a Political Action Committee (the “PAC”) that took positions on ballot referenda in Hoboken.

C. Dio Braxton (“Braxton”) worked for both the Slate and the PAC during the 2013 Election.

D. Candidate 1 was a candidate for the Hoboken City Council and was on the ballot for the November 3, 2015 municipal election in Hoboken (the “2015 Election”).

E. Candidate 2 was a candidate for the Hoboken City Council and was on the ballot for the 2015 Election. Candidate 2 also was the Chairperson of Candidate 2’s campaign committee (the “Campaign Committee”).

F. William Rojas (“Rojas”) worked for Candidate 1 during the 2015 Election.

G. Under New Jersey law, a registered voter was permitted to cast a ballot by mail rather than in person. In Hudson County, 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 through in or about November 2013, at Raia’s direction, CALICCHIO, Braxton and others working for the Slate and or the PAC promised voters that they would be paid \$50 if they applied for and cast mail-in ballots for the 2013 Election. After the 2013 Election, at Raia’s direction, Braxton and others distributed \$50 checks to these voters that were drawn on the PAC’s bank account.

3. Between in or about September 2015 through in or about November 2015, at Candidate 1’s direction, CALICCHIO and Rojas promised voters that they would be paid \$50 if they applied for and cast mail-in ballots for the 2015 Election. After the 2015 Election, at Candidate 1’s direction, CALICCHIO and Rojas delivered \$50 checks to the voters that were drawn on the Campaign Committee’s bank account.

4. Between in or about October 2013 and in or about November 2015, in Hudson County, in the District of New Jersey, and elsewhere, defendant

MATTHEW CALICCHIO

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

manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of the unlawful activity, as set forth below:

Mailing	Subsequent Act
In or about October 2013, CALICCHIO'S co-schemer caused a voter's VBM Application for the 2013 Election to be mailed to the Clerk's Office	In or about November 2013, CALICCHIO'S co-schemers gave a \$50 check to that voter after the 2013 Election
In or about September 2015, CALICCHIO caused a voter's mail-in ballot for the 2015 Election to be mailed to the Clerk's Office.	In or about November 2015, CALICCHIO delivered a \$50 check to that voter after the 2015 Election.

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

Craig Carpenito

CRAIG CARPENITO
United States Attorney

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