

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

UNITED STATES OF AMERICA	:	Crim. No. 19-
	:	
v.	:	18 U.S.C. § 371
	:	
WILLIAM ROJAS	:	

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 WILLIAM ROJAS (“ROJAS”) resided in Hoboken, New Jersey.
 - B. 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”).
 - C. Matthew Calicchio (“Calicchio”) worked for Candidate 1 during the 2015 Election.
 - D. 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”).
 - E. 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. From at least in or about September 2015 to at least in or about November 2015, in Hudson County, in the District of New Jersey, and elsewhere, defendant

WILLIAM ROJAS

knowingly and intentionally combined, conspired, confederated, and agreed with Matthew Calicchio and 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.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

A. At Candidate 1's direction, ROJAS and Calicchio promised voters that they would be paid \$50 if they applied for and cast mail-in ballots for the 2015 Election for Candidate 1.

B. After the 2015 Election, at Candidate 1's direction, ROJAS and Calicchio delivered \$50 checks to the voters that were drawn on the Campaign Committee's bank account.

Overt Acts

5. In furtherance of the conspiracy and in order to effect its object, ROJAS and his co-

conspirators committed or caused the commission of the following overt acts in the District of New Jersey and elsewhere:

A. In or about September 2015, in Hoboken, ROJAS offered a voter \$50 in exchange for the voter submitting a mail-in ballot in the 2015 Election for Candidate 1.

B. In or about October and November 2015, ROJAS obtained a completed mail-in ballot from the voter, which was subsequently mailed to the Clerk's Office.

C. In or about November 2015, in Hoboken, ROJAS handed the voter a \$50 check, issued by the Campaign Committee, in exchange for having voted by mail-in ballot.

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


CRAIG CARPENITO
United States Attorney

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INFORMATION FOR

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