

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X
UNITED STATES OF AMERICA :
 :
 :
 - v. - :
 :
 :
 HAROLD BAIRD, :
 :
 Defendant. :
- - - - -X

INFORMATION

16 Cr. 816 (CS)

COUNT ONE

(Conspiracy to Give False Voter Registrations)

The United States Attorney charges:

BACKGROUND OF THE SCHEME

1. At all times relevant to this Information:

a. In New York, to register to vote in any local, state, or federal election, a person was required to complete a New York State Voter Registration Form. Registration to vote was unitary, that is, a single registration qualified a registrant to cast ballots for any election - local, state, and federal - indefinitely. As part of the Voter Registration Form, the registrant was required to provide the address where he or she lived. The registrant was also required to swear or affirm that he or she had lived within the voting district for a period of 30 days prior to the election.

b. The Village of Bloomingburg (hereinafter "Bloomingburg" or the "Village") was located in Sullivan County,

New York. Its population was approximately 420 people. The Village had a mayor and two trustees. The mayor's duties included presiding over the Village Board, entering into contracts for the Village and approving legislation.

2. At all times relevant to this Information, HAROLD BAIRD, the defendant, did not reside in the Village of Bloomingburg.

3. On or about March 18, 2014, village elections in New York were held. In Bloomingburg, mayor and two trustee positions were up for election.

4. HAROLD BAIRD, the defendant, ran for one of the open Trustee positions in the March 2014 local Bloomingburg election, and voted in the election as well.

THE VOTER REGISTRATION SCHEME

5. From in or about January 2014 through in or about March 2014, HAROLD BAIRD, the defendant, participated in a scheme to submit false Voter Registration Forms so that he could run for political office and vote in Bloomingburg. As part of the scheme, BAIRD, with the assistance of a co-conspirator not named as a defendant herein ("CC-1"), submitted to the Sullivan County Board of Elections at least two Voter Registration Forms for himself in which he claimed that he lived at addresses in Bloomingburg, whereas in fact, as BAIRD and CC-1 well knew, BAIRD did not live in Bloomingburg.

THE CONSPIRACY

6. From in or January 2014 through in or about March 2014, in the Southern District of New York and elsewhere, HAROLD BAIRD, the defendant, together with others known and unknown, knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, giving false information for the purpose of establishing his eligibility to register to vote, in violation of Title 52, United States Code, Section 10307(c).

OVERT ACTS

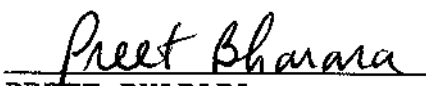
7. In furtherance of the conspiracy and to effect the illegal object thereof, HAROLD BAIRD, the defendant, together with others known and unknown, committed the following overt acts, in the Southern District of New York:

a. On or about February 7, 2014, HAROLD BAIRD, the defendant, submitted to the Sullivan County Board of Elections a New York Voter Registration Form in which he falsely claimed that he lived at an address in Bloomingburg, New York.

b. On or about March 18, 2014, BAIRD submitted to the Sullivan County Board of Elections a second New York Voter Registration Form in which he falsely claimed that he lived at

an address in Bloomingburg, New York, which is owned by CC-1.

(18 U.S.C. § 371)


PREET BHARARA
United States Attorney

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United States Attorney for *Southern District of New York*
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