

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

UNITED STATES OF AMERICA : Crim. No. 09-
:
: 2 U.S.C. §§ 441f and 437g(d)(1)(D);
v. : 18 U.S.C. § 2
:
:
RAYMOND GENESKE : I N F O R M A T I O N

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

1. At all times material to this Information:
 - a. Defendant RAYMOND GENESKE was the Municipal Democratic Chairman in Perth Amboy and long-time political adviser to Joseph Vas. Defendant GENESKE was a key adviser to Joseph Vas regarding Vas's candidacy in the primary election for New Jersey's 13th congressional district. In addition, defendant GENESKE was a member of the Perth Amboy Board of Education, as well as the Middlesex County Improvement Authority ("MCIA").
 - b. Joseph Vas was a candidate in the Democratic primary election for United States Congress for New Jersey's 13th federal district held in or about June 2006. As part of his campaign for Congress, Joseph Vas established a formal campaign, appointed a treasurer, opened bank accounts, received contributions and expended funds. As a candidate, Joseph Vas was required by federal law to file periodic reports with the Federal Election Commission (the "FEC"). The FEC required all campaign

treasurers to file detailed truthful and accurate reports disclosing financial activity of the campaign, including the amount and source of certain contributions and the amount and payee receiving payments for expenses. Joseph Vas also held the position of Mayor of the City of Perth Amboy, New Jersey, from in or about 1990 to in or about June 2008. In addition, Joseph Vas was a State Assemblyman, representing the 19th Legislative District from in or about 2003 to the present.

c. The "Vas for Congress" committee was a political committee, formed and authorized by Joseph Vas, to serve as his principal campaign committee for Vas's 2006 congressional primary campaign. The Committee was authorized to solicit and receive contributions on Vas's behalf.

d. The FEC was an independent regulatory agency that was established in 1975 to administer and enforce the Federal Election Campaign Act ("FECA"). FECA limited the sources and amounts of the contributions used to finance federal elections and required public disclosure of campaign finance information. FECA governed the making and reporting of contributions to federal candidates, including candidates for election to Congress, and specifically: (a) limited the amount of contributions from individuals; (b) prohibited contributions by one person in the name of another person ("conduit contributions"); and (c) required a political committee authorized by a federal candidate to file periodic reports with the FEC identifying each person who made a contribution during

the reporting period that exceeded \$200. During the 2006 election cycle, the campaign contribution limit for donors was \$2,100. FECA required every political committee to have a treasurer who had to authorize all expenditures and make a written record of all funds received as contributions to the political committee.

2. Between in or about 2005 and in or about June 2006, defendant RAYMOND GENESKE participated with others in a scheme to circumvent the cash limitation and reporting requirements of FECA in order to obtain more than \$10,000 in contributions for the "Vas for Congress" committee. As part of the scheme, defendant GENESKE solicited contributions from individuals in the form of checks made payable to the "Vas for Congress" committee in exchange for cash that defendant GENESKE distributed to these straw donors to fund or reimburse their contributions.

3. From in or about 2005 to in or about June 2006, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

RAYMOND GENESKE

knowingly and willfully (a) made contributions within the meaning of Title 2, United States Code, Section 431(8) to a federal candidate in the names of others; (b) caused others to permit their names to be used to effect such contributions; and (c) accepted and received contributions made by one person in the name of another, which violations aggregated to \$10,000 and more during a calendar year.

In violation of Title 2, United States Code, Sections 441f
and 437g(d)(1)(D) and Title 18, United States Code, Section 2.

RALPH J. MARRA, JR.
Acting United States Attorney