SLM/USAO#2009R00924

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 09-

:

v. : 18 U.S.C. § 1951(a)

:

MICHAEL J. MANZO : <u>I N F O R M A T I O N</u>

The defendant having waived in open court prosecution by

Indictment, the Acting United States Attorney for the District of

New Jersey charges that:

Conspiracy to Commit Extortion Under Color of Official Right

- 1. At all times relevant to this Information, defendant MICHAEL J. MANZO, a Jersey City Fire Arson Investigator, was an independent candidate seeking to represent Ward B on the City Council in Jersey City, New Jersey, which election was held on or about May 12, 2009.
- 2. At all times relevant to this Information, Denis Jaslow was an investigator for the Hudson County Board of Elections and a former Senior Corrections Officer with East Jersey State Prison, Department of Corrections.
- 3. At all times relevant to this Information, Joseph Castagna served as the Health Officer with the Jersey City Department of Health and Human Services ("HHS") and was a close associate of defendant MICHAEL J. MANZO.
- 4. 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

Jersey City area and in other New Jersey municipalities. 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.

5. In or about May 2009, in Hudson County, in the District of New Jersey and elsewhere, defendant

MICHAEL J. MANZO

did knowingly and willfully conspire and agree with Joseph Castagna, Denis Jaslow and others to obstruct, delay and affect interstate commerce by extortion under color of official right - that is, by obtaining corrupt cash payments and illicit political contributions from the CW, with consent, in exchange for defendant MICHAEL J. MANZO's future official assistance, action and influence in Jersey City Government matters.

- 6. It was an object of the conspiracy that defendant MICHAEL J. MANZO, Joseph Castagna, Denis Jaslow and others solicited, accepted and agreed to accept corrupt cash payments and illicit political contributions from the CW in exchange for defendant MICHAEL J. MANZO's future official assistance, action and influence in Jersey City Government matters.
- 7. To further the conspiracy and effect its object, the following acts were committed (during, among other times,

conversations recorded by federal law enforcement authorities) in the District of New Jersey and elsewhere:

- a. On or about May 6, 2009, in North Bergen, New Jersey, defendant MICHAEL J. MANZO, Joseph Castagna, Denis Jaslow and the CW conducted a meeting during which defendant MICHAEL J. MANZO agreed to accept a corrupt cash payment of \$5,000 from the CW, to be paid through Joseph Castagna and Denis Jaslow, in exchange for defendant MICHAEL J. MANZO's future official assistance in favor of the CW's purported development project on Garfield Avenue in Jersey City (the "Garfield Development Project").
- b. On or about May 7, 2009, in North Bergen, New Jersey, with the approval of defendant MICHAEL J. MANZO, Joseph Castagna and Denis Jaslow met with the CW, during which meeting Joseph Castagna accepted a corrupt cash payment of \$5,000 from the CW in exchange for defendant MICHAEL J. MANZO's future official assistance in favor of the CW's Garfield Development Project.

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 MICHAEL J. MANZO 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 \$5,000 in United States currency, in that such sum constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of the conspiracy to commit extortion under color of official right.

If any of the above-described forfeitable property, as a result of any act or omission of defendant MICHAEL J. MANZO:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (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 subdivided 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

MICHAEL J. MANZO up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 981 and Title 28 United States Code, Section 2461.

PAUL J. FISHMAN United States Attorney