

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 09-
 :
 v. : 18 U.S.C. § 1951(a)
 :
 LAVERN WEBB-WASHINGTON : 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:

Conspiracy to Commit Extortion Under Color of Official Right

1. At all times relevant to this Information, defendant LAVERN WEBB-WASHINGTON was a candidate for election seeking to represent Ward F on the City Council of Jersey City, New Jersey ("JC Council"), which election was held on or about May 12, 2009, and in which she did not prevail.

2. At all times relevant to this Information, Edward Cheatam was the affirmative action officer for Hudson County and a Commissioner on the Jersey City Housing Authority. At certain times relevant to this Information, Edward Cheatam was also the Vice President of the Jersey City Board of Education.

3. At all times relevant to this Information, there was an individual, now deceased, who owned and operated a consulting firm based in Jersey City (the "Consultant").

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, including on Garfield Avenue. 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. From in or about March 2009 to in or about May 2009, in Hudson County, in the District of New Jersey and elsewhere, defendant

LAVERN WEBB-WASHINGTON

did knowingly and willfully conspire and agree with Edward Cheatam, the Consultant and others to obstruct, delay and affect interstate commerce by extortion under color of official right - that is, by obtaining corrupt cash payments that were paid and to be paid by another, with that person's consent, in exchange for defendant LAVERN WEBB-WASHINGTON's future official assistance, action and influence in Jersey City Government matters.

6. It was an object of the conspiracy that defendant LAVERN WEBB-WASHINGTON accepted and agreed to accept corrupt cash payments from the CW in exchange for defendant LAVERN WEBB-WASHINGTON's future official assistance, action and influence in Jersey City Government matters.

7. It was part of the conspiracy that defendant LAVERN WEBB-WASHINGTON accepted a total of approximately \$15,000 in corrupt cash payments from the CW, in exchange for defendant LAVERN WEBB-WASHINGTON's future official assistance, action and influence in obtaining certain development approvals for the CW on a property purportedly located on Garfield Avenue in Jersey City (the "Garfield Avenue Development").

8. 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 March 24, 2009, in Bayonne, New Jersey, defendant LAVERN WEBB-WASHINGTON met with the CW, Edward Cheatam and the Consultant and agreed with them to accept corrupt cash payments from the CW, in exchange for defendant LAVERN WEBB-WASHINGTON's future official assistance in favor of the CW on the Garfield Avenue Development.

b. On or about March 30, 2009, in Bayonne, New Jersey, defendant LAVERN WEBB-WASHINGTON accepted a corrupt cash payment of approximately \$5,000 from the CW, in exchange for defendant LAVERN WEBB-WASHINGTON's future official assistance in favor of the CW on the Garfield Avenue Development. In addition, defendant LAVERN WEBB-WASHINGTON agreed to accept future corrupt cash payments from the CW to be paid before and after the

election, in exchange for exercising her future official assistance in Jersey City Government matters.

c. On or about April 23, 2009, in Bayonne, New Jersey, defendant LAVERN WEBB-WASHINGTON accepted a corrupt cash payment of approximately \$5,000 from the CW, in exchange for defendant LAVERN WEBB-WASHINGTON's future official assistance in favor of the CW on the Garfield Development.

d. On or about May 7, 2009, in North Bergen, New Jersey, defendant LAVERN WEBB-WASHINGTON accepted a corrupt cash payment of approximately \$5,000 from the CW, in exchange for defendant LAVERN WEBB-WASHINGTON's future official assistance in favor of the CW on the Garfield Development.

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 LAVERN WEBB-WASHINGTON 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 \$15,000 in United States currency, in that such sum constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of 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 LAVERN WEBB-WASHINGTON:

- (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

LAVERN WEBB-WASHINGTON 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.

RALPH J. MARRA, JR.
Acting United States Attorney