## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 09-

:

v. : 18 U.S.C. § 1951(a)

:

CHARLES AMON, : <u>I N F O R M A T I O N</u>

a/k/a "Shaul Amon" :

The defendant having waived in open court prosecution by Indictment, the 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:
- a. Defendant CHARLES AMON resided in Lakewood

  Township, New Jersey and previously worked for the CW, identified

  below, managing properties that the CW owned in and around

  Lakewood Township, New Jersey.
- b. There was a cooperating witness (the "CW") who, at the direction of the Federal Bureau of Investigation, held himself out to be a real estate developer interested in development in several areas of New Jersey, including the Ocean County area. 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.
- c. Jeffrey Williamson served as a Housing Inspector for Lakewood Township in Ocean County, New Jersey. Jeffrey

Williamson was responsible for, among other things, performing inspections and certifying housing units for compliance with pertinent federal, state, and local standards, codes, regulations and procedures.

2. From in or about April 2007 to in or about May 2007, in Ocean County, in the District of New Jersey and elsewhere, defendant

## CHARLES AMON, a/k/a "Shaul Amon,"

did knowingly and willfully conspire and agree with Jeffrey
Williamson, a Lakewood Housing Inspector, to obstruct, delay and
affect interstate commerce by extortion under color of official
right - that is, by obtaining corrupt cash payments for Jeffrey
Williamson from the CW, with consent, in exchange for Jeffrey
Williamson's official assistance, action and influence in
Lakewood Township municipal Government matters as specific
opportunities arose.

- 3. It was an object of the conspiracy that defendant CHARLES AMON and Jeffrey Williamson solicited, and Jeffrey Williamson accepted and agreed to accept, corrupt cash payments from the CW in exchange for Jeffrey Williamson's official assistance, action and influence in Lakewood municipal Government matters as specific opportunities arose.
- 4. 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 April 19, 2007, in Lakewood Township, New Jersey, defendant CHARLES AMON met with the CW and discussed CW's desire to obtain favorable and/or expedited government zoning approvals, specifically, Certificates of Occupancy ("C.O.s") for CW's properties in Lakewood Township. Defendant CHARLES AMON told the CW that on prior occasions, defendant CHARLES AMON had paid Jeffrey Williamson corrupt cash payments in exchange for favorable housing inspections performed for defendant CHARLES AMON by Jeffrey Williamson in order to obtain C.O.s.
- b. On or about April 20, 2007, in Lakewood Township, New Jersey, defendant CHARLES AMON met with the CW and told the CW that defendant CHARLES AMON had arranged for a meeting between the CW and Jeffrey Williamson to discuss obtaining C.O.s for certain Lakewood Township properties owned by the CW. Defendant CHARLES AMON further advised the CW that Jeffrey Williamson would require a corrupt cash payment of approximately \$250 to \$500 in order to assist the CW in obtaining such C.O.s.
- c. On or about April 24, 2007, in Lakewood Township,

  New Jersey, defendant CHARLES AMON, Jeffrey Williamson and the CW

  met at a restaurant to discuss obtaining C.O.s for certain of

  CW's properties in Lakewood Township. During the meeting,

Jeffrey Williamson agreed to assist the CW and to perform the inspections of CW's properties himself (rather than permit other Lakewood Township housing inspectors to perform such inspections), and Jeffrey Williamson accepted a corrupt cash payment of \$500 from the CW in exchange for Jeffrey Williamson's favorable inspections to be performed at CW's properties.

- d. On or about April 27, 2007, in Ocean County, New Jersey, defendant CHARLES AMON told the CW that defendant CHARLES AMON had arranged for another meeting between the CW and Jeffrey Williamson to discuss obtaining C.O.s on additional Lakewood Township properties owned by the CW. Defendant CHARLES AMON further advised the CW that the CW should pay Jeffrey Williamson a corrupt cash payment in the amount of \$1,000 in exchange for Jeffrey Williamson's assistance in obtaining C.O.s for the remainder of CW's properties in Lakewood Township.
- e. On or about May 1, 2007, in Long Branch, New

  Jersey, defendant CHARLES AMON, Jeffrey Williamson and the CW met

  at a restaurant to discuss obtaining C.O.s for approximately

  twenty additional properties owned by the CW in Lakewood

  Township. During the meeting, Jeffrey Williamson agreed, as

  before, to perform the inspections of CW's properties himself

  (rather than permit other Lakewood Township housing inspectors to

  perform such inspections), and Jeffrey Williamson then accepted a

  corrupt cash payment of \$1,000 from the CW in exchange for

Jeffrey Williamson's favorable inspections to be performed on CW's properties.

In violation of Title 18, United States Code, Section 1951(a).

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PAUL J. FISHMAN United States Attorney