

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 09-
 :
 v. : 18 U.S.C. § 1951(a) and § 2
 :
 ANGELA BELLIZZI : 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 that:

Attempted Obstruction of Interstate Commerce by Extortion
Under Color of Official Right

1. At all times relevant to this Information:

a. Defendant ANGELA BELLIZZI was employed as a supervisor of permits and connection fees for the Jersey City Municipal Utilities Authority ("JCMUA") in Jersey City, New Jersey. As a supervisor, defendant BELLIZZI was responsible for, among other things, reviewing and ultimately approving various JCMUA permit applications.

b. A cooperating witness ("CW") owned and/or renovated residential properties in Jersey City (collectively referred to as "the Properties"). At various times throughout construction, the CW was required to apply for sewer connection permits for the Properties. CW's business was based in New Jersey and paid for goods and services in interstate commerce.

c. Permit application fees were determined by the

number of family units per residence. For example, in or about 2007, a two-family unit required a permit application fee of approximately \$1,791. A three-family unit required a permit application fee of approximately \$2,388 during the same time period.

2. From in or about January 2005 to in or about June 2008, defendant BELLIZZI: (i) accepted corrupt cash payments in exchange for her official assistance in, and approval of, fraudulent permit applications; (ii) agreed to accept corrupt cash payments in exchange for her agreement to falsify such permit applications and/or the approval of fraudulent permit applications wherein properties were described as having fewer family units for the purpose of circumventing higher permit application fees; and (iii) solicited corrupt payments in exchange for her official assistance in preparing and approving falsified permit applications. Specific instances of this corrupt conduct included, but were not limited to, the following:

a. Beginning in or about January 2005, defendant BELLIZZI offered to save the CW money by altering CW's sewer permit applications so that the property for which the sewer connection permit would be granted would appear to be a two-family, as opposed to a three-family residence for the purpose of circumventing the higher permit application fee.

The Pine Street Property

b. On or about October 9, 2007, defendant BELLIZZI and the CW engaged in a telephone conversation. During that call, which was recorded, defendant BELLIZZI told the CW that she was owed "4," a reference to \$400 she was seeking in exchange for her agreement to falsify and/or approve a falsified permit application. The CW and defendant BELLIZZI agreed to meet in person to further discuss the matter.

c. On or about October 16, 2007, defendant BELLIZZI met with the CW at the CW's office in Jersey City. During that meeting, which was recorded, defendant BELLIZZI and the CW discussed the various properties for which the CW needed permits. Defendant BELLIZZI agreed to approve permit applications which identified two-family units, as opposed to three-family residences, for the purpose of circumventing the applicable higher permit application fees. Defendant BELLIZZI instructed the CW to bring the permit applications to her office in the morning because she was typically the only one in at that time. During this meeting, defendant BELLIZZI accepted a \$500 corrupt cash payment. Defendant BELLIZZI was informed by the CW that this amount represented the "4" and "a little extra."

The Virginia Avenue Property

d. On or about December 11, 2007, during a recorded telephone call, defendant BELLIZZI was informed by the CW that

the CW had some wine that she had previously inquired about and would provide it to her the following day. Defendant BELLIZZI further was advised by the CW that there was an additional application for a property located at 391 Virginia Avenue in Jersey City and asked that defendant BELLIZZI complete the amounts for the permit application fees. Defendant BELLIZZI stated that she would come to the CW's office around lunchtime the next day.

e. On or about December 12, 2007, defendant BELLIZZI met with the CW at the CW's office in Jersey City. Defendant BELLIZZI instructed the CW how to fraudulently complete the application for a sewer permit for the property located at 391 Virginia Avenue. Defendant BELLIZZI indicated that the Virginia Avenue property was a two-family, as opposed to a three-family residence. When the CW expressed concern about falsifying these documents, defendant BELLIZZI assured the CW that no one else reviewed the forms. Defendant BELLIZZI further advised the CW that the CW was saving approximately \$1,500 in permit application fees and that the CW owed her \$200 in exchange for her official action in falsifying these documents. Defendant BELLIZZI accepted an additional \$200 corrupt cash payment from the CW during that meeting.

The Kearny Avenue Property

f. On or about March 20, 2008, defendant BELLIZZI

again met with the CW at the CW's office in Jersey City. During this recorded meeting, defendant BELLIZZI instructed the CW how to falsify the sewer permit application for a property located at 214 Kearny Avenue in Jersey City by indicating that the property was a two-family, rather than a three-family residence.

Defendant BELLIZZI further advised that the CW was saving approximately \$1,300-\$1,500 in permit fees and that the CW owed her \$200 in exchange for her official action in approving the fraudulent documents. Defendant BELLIZZI went on to state that she "normally" charged other contractors \$300 for similar fraudulently prepared permit applications. During that meeting, defendant BELLIZZI accepted a \$200 corrupt cash payment.

Defendant BELLIZZI was informed by the CW that there could be additional contractors who would be interested in working with defendant BELLIZZI to circumvent permit application fees and that the CW would split any future corrupt payments with defendant BELLIZZI. Defendant BELLIZZI agreed to this arrangement if the corrupt payments were \$400 and instructed the CW to "[h]ave all the money go through you."

3. From in or about January 2005 to in or about June 2008, in Hudson County, in the District of New Jersey and elsewhere, defendant

ANGELA BELLIZZI

did knowingly and willfully attempt to obstruct, delay and affect

interstate commerce by extortion under color of official right - that is, by demanding and accepting corrupt payments that were paid by CW, with CW's consent, in exchange for defendant ANGELA BELLIZZI's official assistance to include, falsifying and approving fraudulent permit applications submitted in connection with CW's properties as specific opportunities arose.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

RALPH J. MARRA, JR.
Acting United States Attorney