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AUG 29 2012

AT 8:30 UNITED STATES DISTRICT COURT
WILLIAM T. WALSH, CLERK DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

BRYANT VENEGAS

: Hon. (JAP)
:
: Criminal No. 12- 575
:
: 18 U.S.C. § 666(a)(2)
: 18 U.S.C. § 2

INDICTMENT

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT 1

18 U.S.C. § 666(a)(2) and § 2
(Bribery)

1. At all times relevant to this Indictment:

a. Defendant BRYANT VENEGAS was a contractor who had
worked on construction projects in Union City, New Jersey.

b. There was a witness who was cooperating with
federal authorities (the "CW").

c. The City of Union City, New Jersey was a local
government that received federal assistance in excess of \$10,000
each year beginning January 1, 2007 through December 31, 2011.

d. There was a certain Union City government employee
who was a supervisory level employee (the "Union City Official")
and who was known to defendant BRYANT VENEGAS.

2. Between in or about at least October 2007 and in or about June 2011, in Hudson, Passaic and Essex Counties, in the District of New Jersey, and elsewhere, defendant

BRYANT VENEGAS

did knowingly and corruptly agree to give a thing of value to an agent of a local government, with the intent to influence and reward an agent of a local government, in connection with a business, transaction and series of transactions of such government involving a thing of value of \$5,000 and more.

3. Between in or about October 2007 and in or about June 2011:

a. Defendant BRYANT VENEGAS intermittently met and communicated with the CW to discuss (i) the CW's relative's purported interest in developing a property in Union City, New Jersey, and (ii) defendant BRYANT VENEGAS's ability to assist the CW in obtaining the needed zoning approval for such a project.

b. Defendant BRYANT VENEGAS was advised by the CW that the CW's relative wanted to develop a particular parcel of property in Union City, New Jersey (the "Union City Property") and needed zoning approval for the project.

c. Defendant BRYANT VENEGAS told the CW that the CW would need to provide money to corruptly pay Union City officials for zoning approval of the project pertaining to the Union City Property.

d. Defendant BRYANT VENEGAS agreed with the CW that defendant BRYANT VENEGAS would give some of the cash payments that defendant BRYANT VENEGAS accepted from the CW to the Union City Official to influence and reward that official in consideration for his official assistance with the zoning approval of the project pertaining to the Union City Property.

e. Defendant BRYANT VENEGAS intermittently expressed concern over whether the CW was taping their conversations on behalf of law enforcement authorities and advised the CW that if someone were to set defendant BRYANT VENEGAS up, defendant BRYANT VENEGAS would kill that person by putting "one" in that person's "dome," meaning shooting that individual in the head.

f. In the Counties of Passaic and Hudson, New Jersey, defendant BRYANT VENEGAS accepted a series of cash payments totaling approximately \$14,000 from the CW, which defendant BRYANT VENEGAS agreed with the CW would be used in whole and in part to corruptly pay Union City officials, including the Union City Official, to influence and reward those officials, in connection with the zoning approval of the project pertaining to the Union City Property.

In violation of Title 18, United States Code, Sections
666(a)(2) and 2.

A TRUE BILL


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 12- 575 (JAP)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

BRYANT VENEGAS

INDICTMENT FOR

18 U.S.C. § 666 (a) (2)

18 U.S.C. § 2

A True Bill,

Foreperson

PAUL J. FISHMAN

UNITED STATES ATTORNEY

NEWARK, NEW JERSEY

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