

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
: :
: :
v. : Criminal No.
: :
: 18 U.S.C. §§ 371 and 2,
JOSEPH BIGICA : and 26 U.S.C. § 7212(a)

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Count 1

(Corrupt Interference with
Administration of the Internal Revenue Laws)

1. At all times relevant to this Information:

Defendant JOSEPH BIGICA

(a) Defendant JOSEPH BIGICA individually, and through his companies Joseph Bigica Inc. and Joseph Bigica LLC (collectively, the "Bigica Companies"), was an independent insurance broker. Defendant JOSEPH BIGICA's personal residence was located in Franklin Lakes, New Jersey (the "Franklin Lakes property").

The Internal Revenue Service

(b) The Internal Revenue Service (the "IRS") was an agency of the United States Department of the Treasury responsible for administering and enforcing the internal revenue laws of the United States and, as such, performed the lawful functions of

ascertaining, computing, assessing, and collecting taxes owed to the United States.

(c) The internal revenue laws of the United States require every citizen and resident of the United States who receives gross income in excess of the minimum filing amount established by law for a particular year to make and file annually an income tax return for that calendar year, typically by April 15 of the following year. Individuals are required to prepare and file income tax returns on Form 1040, United States Individual Income Tax Return, or its equivalent, and to pay any taxes that are owed.

(d) When an individual files a United States Individual Income Tax Return, the IRS is authorized to check the accuracy of the tax return and determine if an individual has paid the correct amount of tax. If an individual has not paid all tax that is owed, the IRS has the authority to take action to have the individual make payment of the tax due.

(e) When an individual who is required to file a United States Individual Income Tax Return fails to do so, the IRS has the authority under the internal revenue laws to compute the individual's tax based on the individual's income reported to the IRS by third-parties, such as the individual's employer or bank, and to assess the amount of tax due.

(f) If an individual has not paid all tax that is owed, the IRS has the authority under the internal revenue laws to collect

the tax that is owed. Among the actions that the IRS is authorized to take to collect taxes that are owed are the following:

(1) The IRS may issue a summons to compel a third-party, such as a financial institution, to provide information that will enable the IRS to identify an individual's property, such as funds in a bank account in the name of the individual, that may be used to satisfy the individual's tax liability;

(2) The IRS may file a notice of federal tax lien in the public records to make a legal claim to an individual's property, such as a personal residence owned by the individual or a bank account in the name of the individual, as security for the payment of the individual's tax liability; and

(3) The IRS may serve a notice of levy to attach an individual's property, such as a personal residence owned by the individual or a bank account in the name of the individual, and may seize such property to satisfy the individual's tax liability to the United States.

**Defendant JOSEPH BIGICA's Failure to Timely
File Tax Returns and to Pay Taxes When
Due for the Calendar Years 1999 Through 2006**

2. During the calendar years 1999 through 2006, defendant JOSEPH BIGICA had gross income totaling approximately \$5,801,888

on which approximately \$1,488,020 in taxes were due.

3. Despite earning sufficient income to trigger his legal duty to file United States Individual Income Tax Returns for each calendar year from 1999 through 2006, defendant JOSEPH BIGICA did not timely file such tax returns and failed to pay taxes for such calendar years when due.

The July 9, 2007 IRS Notification Letters

4. On or about July 9, 2007, the IRS issued letters notifying defendant JOSEPH BIGICA that the IRS had no record of receiving his 2003 and 2004 United States Individual Income Tax Returns and, based upon income to defendant JOSEPH BIGICA that was reported by third-parties identified in such letters, the IRS had computed a total amount due from defendant JOSEPH BIGICA to the IRS of approximately \$60,968 for calendar year 2003 and approximately \$238,449 for calendar year 2004 (the "July 9, 2007 IRS Notification Letters").

Transfer of the Franklin Lakes Property

5. On or about September 24, 2007, approximately two and a half months after the IRS issued the July 9, 2007 IRS Notification Letters, defendant JOSEPH BIGICA caused ownership of the Franklin Lakes property to be transferred from himself, his spouse, and his mother solely to his spouse in return for the sum of \$1.00.

**Defendant JOSEPH BIGICA's Tax Return
Filings for Calendar Years 1999-2009**

6. On or about the dates listed below, after the IRS had issued the July 9, 2007 IRS Notification Letters, defendant JOSEPH BIGICA made, subscribed, filed, and caused to be filed with the IRS United States Individual Income Tax Returns for the calendar years identified below, which tax returns stated that defendant JOSEPH BIGICA's gross income and taxes owed for such calendar years were the approximate amounts set forth below:

Filing Date	Calendar Year	Gross Income Reported	Tax Due
12/8/08	1999	\$754,825	\$ 186,696
12/8/08	2000	\$642,080	\$ 232,068
12/8/08	2001	\$844,440	\$ 302,241
12/8/08	2002	\$731,532	\$ 222,020
2/21/08	2003	\$307,665	\$ 69,871
2/21/08	2004	\$664,524	\$ 123,967
5/29/08	2005	\$1,086,845	\$ 142,234
6/20/08	2006	\$769,977	\$ 208,923
10/20/08	2007	\$689,180	\$ 204,536
4/15/09	2008	\$1,038,706	\$ 302,630
10/14/10	2009	\$1,139,422	\$ 203,650
	Totals for Calendar Years 1999- 2009	\$8,669,196	\$2,198,836

**Defendant JOSEPH BIGICA's
Offer in Compromise to the IRS**

7. On or about February 10, 2009, defendant JOSEPH BIGICA caused to be submitted to the IRS an Offer in Compromise as to his tax liabilities for calendar years 1999-2008. In that Offer in Compromise, defendant JOSEPH BIGICA stated in pertinent part

that he did not have the ability to pay the outstanding tax liability in full.

8. On or about February 10, 2009, defendant JOSEPH BIGICA caused to be submitted to the IRS Form 433-A, Collection Information Statement for Wage Earners and Self-Employed Individuals (the "Collection Information Statement") in connection with his Offer in Compromise. In the Collection Information Statement, defendant JOSEPH BIGICA responded, "No", to the IRS's question, "In the past 10 years, have any assets been transferred by the individual [defendant JOSEPH BIGICA] for less than full value"?

**Defendant JOSEPH BIGICA's Corrupt
Scheme to Obstruct and Impede the IRS**

9. From on or about April 15, 2000 to in or about September 2011, defendant JOSEPH BIGICA corruptly obstructed and impeded and endeavored to obstruct and impede the IRS in performing its lawful functions of ascertaining, computing, assessing, and collecting taxes.

10. Among the means by which defendant JOSEPH BIGICA corruptly endeavored to defeat the lawful functions of the IRS by attempting to conceal from the IRS his income and assets and to prevent the IRS from collecting the taxes that he owed to the United States were conducting his personal financial transactions through accounts not held in his own name and making extensive use of a check casher.

11. Through such corrupt endeavors, defendant JOSEPH BIGICA, while not paying his tax liability to the United States and claiming to the IRS that he did not have the ability to pay his outstanding tax liability in full, enabled himself to lead an extravagant lifestyle, spending substantial amounts of money on personal expenses such as a residence at a club in St. Thomas, United States Virgin Islands (the "St. Thomas residence"); a Lamborghini automobile; a Ferrari automobile; pool service; vacations; and political campaign contributions including the reimbursements of unlawful contributions made in the names of other individuals to circumvent the requirements of the Federal Election Campaign Act as described in detail in Count 2.

12. From on or about April 15, 2000 to in or about September 2011, in the District of New Jersey and elsewhere, defendant

JOSEPH BIGICA

corruptly obstructed and impeded, and endeavored to obstruct and impede, the due administration of the internal revenue laws of the United States through various means including the acts described in Paragraphs 13 through 18 below.

13. From on or about April 15, 2000 to in or about September 2011, defendant JOSEPH BIGICA attempted to conceal from the IRS his income and assets and to obstruct the IRS from collecting the taxes that he owed to the United States.

Conducting Personal Financial Transactions Through Means Designed to Deceive the IRS

14. From in or about April 2005 to in or about September 2011, defendant JOSEPH BIGICA attempted to avoid conducting his personal financial transactions through accounts in his own name to prevent the IRS from identifying his income and assets and seizing accounts held in his name to satisfy his tax liability to the United States.

Bank Accounts in the Names of the Bigica Companies

15. From in or about March 2006 to in or about March 2011, defendant JOSEPH BIGICA used and caused to be used bank accounts in the names of the Bigica Companies to pay for personal expenses including, but not limited to, the following during that period:

- (a) Approximately \$781,123 in mortgage payments for the Franklin Lakes property;
- (b) Approximately \$88,904 for a Lamborghini automobile;
- (c) Approximately \$73,530 in payments related to the St. Thomas residence;
- (d) Approximately \$70,725 to jewelers;
- (e) Approximately \$60,348 for a Ferrari automobile;
- (f) Approximately \$12,045 for pool service; and
- (g) Political contributions including check payments from an account in the name of one of the Bigica Companies to reimburse unlawful federal campaign contributions that are referred to in Paragraph 10 of Count 2.

Bank Account in the Name of Defendant JOSEPH BIGICA's Spouse

16. From in or about April 2005 to in or about November 2009, defendant JOSEPH BIGICA used and caused to be used a bank account in the name of his spouse to deposit proceeds of the Bigica Companies and to pay for personal expenses including, but not limited to, the following during that period:

- (a) Approximately \$65,700 in mortgage payments for the Franklin Lakes property;
- (b) Approximately \$11,382 for a Lamborghini automobile;
- (c) Approximately \$4,000 for a Ferrari automobile; and
- (d) Political contributions including check payments from his spouse's account to reimburse unlawful federal campaign contributions that are referred to in Paragraph 10 of Count 2.

Credit Card Account in the Name of Others

17. From in or about April 2007 to in or about August 2011, defendant JOSEPH BIGICA used and caused to be used a credit card account in the names of an employee of the Bigica Companies and the employee's spouse to pay for defendant JOSEPH BIGICA's personal expenses including, but not limited to, the following during that period:

- (a) Approximately \$91,743 from 2008 to 2011 for vacations; and
- (b) Approximately \$4,600 for unlawful federal campaign contributions that are referred to in Paragraph 10(c)(5) of Count 2 herein.

Defendant JOSEPH BIGICA's Use of a Check Casher

18. From in or about July 2004 to in or about September 2011, defendant JOSEPH BIGICA cashed and caused to be cashed approximately 241 checks totaling approximately \$2,513,887 that were payable to himself; the Bigica Companies; Open MRI & Imaging of Newark, PA, a company with which defendant JOSEPH BIGICA was affiliated ("Open MRI"); and others at a check cashing establishment located in Jersey City, New Jersey.

In violation of Title 26, United States Code, Section 7212(a) and Title 18, United States Code, Section 2.

Count 2

(Conspiracy to Violate the Federal Election Campaign Act - Contributions to a Federal Candidate in the Names of Other Persons)

1. Paragraph 1(a) of Count 1 is hereby realleged and incorporated by reference as though fully set forth herein.

2. At all times relevant to Count 2 of the Information:

(a) Committee A served as the principal campaign committee for an individual who was a candidate for federal office. Committee A was renamed Committee B, which served as the principal campaign committee for the same individual who became a candidate for another federal office. Committee A and Committee B (collectively, the "Committee") were authorized to receive contributions and make expenditures for this federal candidate.

(b) As the principal campaign committee for this federal candidate, the Committee was subject to the reporting provisions and campaign financing limitations and prohibitions of the Federal Election Campaign Act, 2 U.S.C. §§ 431-455 ("FECA").

(c) The Federal Election Commission (the "FEC") was an independent regulatory agency established to administer and enforce FECA. FECA limited the sources and amounts of contributions used to finance federal elections and required public disclosure of campaign finance information. FECA also governed the making and reporting of contributions to federal candidates and specifically:

(1) limited the amount of contributions from

individuals to federal candidates;

(2) prohibited contributions by one person in the name of another person ("Straw Contributions"); and

(3) required a political committee authorized by a federal candidate to file periodic reports with the FEC identifying each person who made a contribution during the reporting period that exceeded \$200.

(d) Specific provisions of FECA governed the making and reporting of campaign contributions. These included the following provisions:

(1) The maximum individual contribution (per election) allowed by law to any federal candidate or his or her authorized political committee was \$2,100 for the calendar years 2005-2006, \$2,300 for calendar years 2007-2008, and \$2,400 for calendar year 2009.

(2) It was unlawful to make contributions in the name of another person or knowingly permit one's name to be used to effect such contributions (the person in whose name such a contribution is made is known as a "Straw Contributor").

(3) The Committee was required to have a treasurer who had to make a written record of all funds received as contributions to the political committee and to authorize all expenditures.

(4) The Committee, by its treasurer, was required to

file quarterly reports and pre-election and post-election reports with the FEC identifying each person who made a contribution during the reporting period whose contributions or contributions for that election cycle aggregated to over \$200.

(5) The FEC was responsible for providing accurate information to the public about the amounts and sources of campaign contributions, and it used these quarterly reports to administer and enforce FECA.

The Conspiracy

3. From in or about April 2005 to in or about May 2009, in the District of New Jersey, and elsewhere, defendant

JOSEPH BIGICA

did knowingly and intentionally conspire with others to:

(a) knowingly and willfully make contributions to a candidate for federal office in the names of other persons, aggregating more than \$10,000 in calendar year 2005, in violation of Title 2, United States Code, Sections 437g(d) (1) (D) (i) and 441f;

(b) knowingly and willfully make contributions to a candidate for federal office in the names of other persons, aggregating \$25,000 and more in calendar year 2006, in violation of Title 2, United States Code, Sections 437g(d) (1) (A) (i) and 441f;

(c) knowingly and willfully make contributions to a

candidate for federal office in the names of other persons, aggregating more than \$10,000 in calendar year 2007, in violation of Title 2, United States Code, Sections 437g(d)(1)(D)(i) and 441f; and

(d) knowingly and willfully make contributions to a candidate for federal office in the names of other persons, aggregating \$2,000 and more in calendar year 2009, in violation of Title 2, United States Code, Sections 437g(d)(1)(A)(ii) and 441f.

Object of the Conspiracy

4. The principal object of the conspiracy was for defendant JOSEPH BIGICA to circumvent FECA's limits on the amount of money an individual could lawfully contribute to a federal candidate by having Straw Contributions made to the Committee in the names of Straw Contributors who were unlawfully funded and reimbursed by defendant JOSEPH BIGICA.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that, from in or about April 2005 to in or about May 2009, defendant JOSEPH BIGICA directly and indirectly contacted and recruited Straw Contributors to issue checks drawn on their own accounts and made payable to the Committee, which checks were sent to the Committee and deposited into the Committee's bank account.

6. It was further part of the conspiracy that defendant JOSEPH BIGICA directly and indirectly provided money for Straw

Contributions that were made by Straw Contributors to the Committee.

7. It was further part of the conspiracy that defendant JOSEPH BIGICA utilized family members, business associates, and others as Straw Contributors. These Straw Contributors are identified as follows:

STRAW CONTRIBUTOR 1	Defendant JOSEPH BIGICA's relative
STRAW CONTRIBUTOR 2	Defendant JOSEPH BIGICA's relative
STRAW CONTRIBUTOR 3	Defendant JOSEPH BIGICA's relative
STRAW CONTRIBUTOR 4	The employee of the Bigica Companies referred to in Paragraph 17 of Count 1 and a conspirator not charged as a defendant in Count 2
STRAW CONTRIBUTOR 5	STRAW CONTRIBUTOR 4's spouse
STRAW CONTRIBUTOR 6	An employee of Open MRI, a company with which defendant JOSEPH BIGICA was affiliated
STRAW CONTRIBUTOR 7	STRAW CONTRIBUTOR 6's spouse
STRAW CONTRIBUTOR 8	An associate of defendant JOSEPH BIGICA and the father of STRAW CONTRIBUTORS 9, 10, and 12
STRAW CONTRIBUTOR 9	STRAW CONTRIBUTOR 8's daughter
STRAW CONTRIBUTOR 10	STRAW CONTRIBUTOR 8's daughter
STRAW CONTRIBUTOR 11	STRAW CONTRIBUTOR 10's spouse
STRAW CONTRIBUTOR 12	STRAW CONTRIBUTOR 8's daughter
STRAW CONTRIBUTOR 13	STRAW CONTRIBUTOR 12's spouse
STRAW CONTRIBUTOR 14	An associate of defendant JOSEPH BIGICA
STRAW CONTRIBUTOR 15	STRAW CONTRIBUTOR 14's spouse
STRAW CONTRIBUTOR 16	An associate of STRAW CONTRIBUTOR 14
STRAW CONTRIBUTOR 17	STRAW CONTRIBUTOR 16's spouse

STRAW CONTRIBUTOR 18	An associate of STRAW CONTRIBUTOR 14
STRAW CONTRIBUTOR 19	STRAW CONTRIBUTOR 18's spouse

8. It was further part of the conspiracy that, from in or about April 2005 to in or about May 2009, STRAW CONTRIBUTOR 4 agreed to assist defendant JOSEPH BIGICA in circumventing FECA's limits on the amount of money an individual could lawfully contribute to a federal candidate by serving as a Straw Contributor and by facilitating defendant JOSEPH BIGICA's efforts to make and cause to make contributions to the Committee through Straw Contributors.

9. It was further part of the conspiracy that defendant JOSEPH BIGICA caused the following Straw Contributions to be made as set forth in the tables below showing the dates on or about which the Committee received such contributions:

Straw Contributor in 2005	Approximate Amount	Date Received by the Committee
STRAW CONTRIBUTOR 1	\$2,100	6/30/2005
STRAW CONTRIBUTOR 1	\$2,100	6/30/2005
STRAW CONTRIBUTOR 2	\$2,100	4/04/2005
STRAW CONTRIBUTOR 2	\$1,900	4/04/2005
STRAW CONTRIBUTOR 3	\$1,900	4/04/2005
STRAW CONTRIBUTOR 3	\$2,100	4/04/2005
STRAW CONTRIBUTOR 4	\$700	6/30/2005
STRAW CONTRIBUTOR 4	\$2,100	6/30/2005
TOTAL IN 2005	\$15,000	
Straw Contributor in 2006	Approximate Amount	Date Received by the Committee
STRAW CONTRIBUTOR 4	\$1,800	3/31/2006
STRAW CONTRIBUTOR 5	\$2,100	3/31/2006
STRAW CONTRIBUTOR 5	\$2,100	3/31/2006
STRAW CONTRIBUTOR 6	\$2,100	4/11/2006

STRAW CONTRIBUTOR 6	\$1,700	4/11/2006
STRAW CONTRIBUTOR 7	\$2,100	4/11/2006
STRAW CONTRIBUTOR 7	\$2,100	4/11/2006
STRAW CONTRIBUTOR 8	\$2,100	3/31/2006
STRAW CONTRIBUTOR 8	\$1,900	3/31/2006
STRAW CONTRIBUTOR 9	\$2,100	3/31/2006
STRAW CONTRIBUTOR 9	\$1,900	3/31/2006
STRAW CONTRIBUTOR 10	\$2,100	3/31/2006
STRAW CONTRIBUTOR 10	\$2,100	3/31/2006
STRAW CONTRIBUTOR 11	\$2,100	3/31/2006
STRAW CONTRIBUTOR 11	\$1,700	3/31/2006
STRAW CONTRIBUTOR 12	\$2,100	3/31/2006
STRAW CONTRIBUTOR 12	\$1,700	3/31/2006
STRAW CONTRIBUTOR 13	\$2,100	3/31/2006
STRAW CONTRIBUTOR 13	\$2,100	3/31/2006
STRAW CONTRIBUTOR 14	\$2,100	3/31/2006
STRAW CONTRIBUTOR 14	\$2,100	3/31/2006
STRAW CONTRIBUTOR 15	\$2,100	3/31/2006
STRAW CONTRIBUTOR 15	\$1,700	3/31/2006
STRAW CONTRIBUTOR 16	\$2,100	3/31/2006
STRAW CONTRIBUTOR 16	\$2,100	3/31/2006
STRAW CONTRIBUTOR 17	\$2,100	3/31/2006
STRAW CONTRIBUTOR 17	\$1,700	3/31/2006
STRAW CONTRIBUTOR 18	\$2,100	3/31/2006
STRAW CONTRIBUTOR 18	\$2,100	3/31/2006
STRAW CONTRIBUTOR 19	\$1,700	3/30/2006
STRAW CONTRIBUTOR 19	\$2,100	3/30/2006
TOTAL IN 2006	\$62,000	
Straw Contributor in 2007	Approximate Amount	Date Received by the Committee
STRAW CONTRIBUTOR 1	\$2,300	5/07/2007
STRAW CONTRIBUTOR 2	\$2,300	5/07/2007
STRAW CONTRIBUTOR 3	\$2,300	4/17/2007
STRAW CONTRIBUTOR 3	\$300	4/17/2007
STRAW CONTRIBUTOR 4	\$2,300	4/17/2007
STRAW CONTRIBUTOR 5	\$2,300	4/17/2007
STRAW CONTRIBUTOR 8	\$2,300	5/07/2007
TOTAL IN 2007	\$14,100	
Straw Contributor in 2009	Approximate Amount	Date Received by the Committee
STRAW CONTRIBUTOR 1	\$2,400	5/5/2009
STRAW CONTRIBUTOR 1	\$100	5/5/2009
STRAW CONTRIBUTOR 2	\$2,400	5/5/2009

STRAW CONTRIBUTOR 2	\$100	5/5/2009
STRAW CONTRIBUTOR 4	\$2,400	5/5/2009
STRAW CONTRIBUTOR 4	\$100	5/5/2009
TOTAL IN 2009	\$7,500	

Overt Acts

10. In furtherance of the conspiracy and to effectuate the objects thereof, defendant JOSEPH BIGICA, conspirator STRAW CONTRIBUTOR 4, and others committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

STRAW CONTRIBUTOR 1 and STRAW CONTRIBUTOR 2

(a) Acts involving STRAW CONTRIBUTOR 1 [defendant JOSEPH BIGICA'S relative] and STRAW CONTRIBUTOR 2 [defendant JOSEPH BIGICA's relative]:

(1) Defendant JOSEPH BIGICA caused his spouse to issue a check in the amount of \$4,000, dated April 2, 2005, drawn on a bank account in the name of defendant JOSEPH BIGICA's spouse made payable to STRAW CONTRIBUTOR 2 to provide money for Straw Contributions.

(2) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 2 to issue a check in the amount of \$4,000, dated May 2, 2005, drawn on an account in the names of STRAW CONTRIBUTOR 1 and STRAW CONTRIBUTOR 2 made payable to the Committee.

(3) Defendant JOSEPH BIGICA caused an official check to be issued in the amount of \$4,200, dated June 29, 2005, naming STRAW CONTRIBUTOR 1 as the remitter made payable to the

Committee.

(4) Defendant JOSEPH BIGICA issued a check in the amount of \$4,600, dated April 17, 2007, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was deposited into an account in the names of STRAW CONTRIBUTOR 1 and STRAW CONTRIBUTOR 2.

(5) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 2 to issue a check in the amount of \$4,600, dated April 20, 2007, drawn on an account in the names of STRAW CONTRIBUTOR 1 and STRAW CONTRIBUTOR 2 made payable to the Committee.

(6) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 2 to issue a check in the amount of \$5,000, dated April 29, 2009, drawn on an account in the names of STRAW CONTRIBUTOR 1 and STRAW CONTRIBUTOR 2 made payable to the Committee.

STRAW CONTRIBUTOR 3

(b) Acts involving STRAW CONTRIBUTOR 3 [defendant JOSEPH BIGICA's relative]:

(1) Defendant JOSEPH BIGICA caused his spouse to issue a check in the amount of \$4,000, dated April 2, 2005, drawn on a bank account in the name of defendant JOSEPH BIGICA's spouse made payable to STRAW CONTRIBUTOR 3 to provide money for Straw Contributions.

(2) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 3 to issue a check in the amount of \$4,000, in or about April

2005, drawn on an account in the name of STRAW CONTRIBUTOR 3 made payable to the Committee.

(3) Defendant JOSEPH BIGICA issued a check in the amount of \$2,600, dated April 15, 2007, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was deposited into a bank account in the name of STRAW CONTRIBUTOR 3.

(4) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 3 to issue a check in the amount of \$2,600, dated April 15, 2007, drawn on an account in the name of STRAW CONTRIBUTOR 3 made payable to the Committee.

STRAW CONTRIBUTOR 4 and STRAW CONTRIBUTOR 5

(c) Acts involving conspirator STRAW CONTRIBUTOR 4 [an employee of the Bigica Companies] and STRAW CONTRIBUTOR 5 [STRAW CONTRIBUTOR 4's spouse]:

(1) Defendant JOSEPH BIGICA caused his spouse to issue a check in the amount of \$2,800, dated June 29, 2005, drawn on a bank account in the name of defendant JOSEPH BIGICA's spouse made payable to cash to provide money for Straw Contributions, the proceeds of which check were deposited into an account in the names of STRAW CONTRIBUTOR 4 and STRAW CONTRIBUTOR 5.

(2) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 4 to issue a check in the amount of \$2,800, dated June 29, 2005,

drawn on an account in the names of STRAW CONTRIBUTOR 4 and STRAW CONTRIBUTOR 5 made payable to the Committee.

(3) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 4 to issue a check in the amount of \$6,000, dated March 31, 2006, drawn on an account in the names of STRAW CONTRIBUTOR 4 and STRAW CONTRIBUTOR 5 made payable to the Committee.

(4) Defendant JOSEPH BIGICA issued a check in the amount of \$6,000, dated April 4, 2006, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was endorsed by STRAW CONTRIBUTOR 5.

(5) On or about April 18, 2007, at the direction of defendant JOSEPH BIGICA and to effect a Straw Contribution, STRAW CONTRIBUTOR 4 used a credit card account in the names of STRAW CONTRIBUTOR 4 and STRAW CONTRIBUTOR 5 to make payments totaling \$4,600 to the Committee.

(6) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 4 to issue a check in the amount of \$2,500, dated April 30, 2009, drawn on an account in the name of STRAW CONTRIBUTOR 4 made payable to the Committee.

STRAW CONTRIBUTOR 6 and STRAW CONTRIBUTOR 7

(d) Acts involving STRAW CONTRIBUTOR 6 [an employee of Open MRI] and STRAW CONTRIBUTOR 7 [STRAW CONTRIBUTOR 6's spouse]:

(1) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 6 to issue a check in the amount of \$8,000, dated March 31, 2006,

drawn on an account in the names of STRAW CONTRIBUTOR 6 and STRAW CONTRIBUTOR 7 made payable to the Committee.

(2) Defendant JOSEPH BIGICA issued a check in the amount of \$8,000, dated April 4, 2006, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was endorsed by STRAW CONTRIBUTOR 6.

STRAW CONTRIBUTOR 8

(e) Acts involving STRAW CONTRIBUTOR 8 [an associate of defendant JOSEPH BIGICA and the father of STRAW CONTRIBUTORS 9, 10, and 12]:

(1) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 8 to issue a check in the amount of \$4,000, dated March 31, 2006, drawn on an account in the name of STRAW CONTRIBUTOR 8 made payable to the Committee.

(2) Defendant JOSEPH BIGICA issued a check in the amount of \$4,000, dated April 4, 2006, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was endorsed by STRAW CONTRIBUTOR 8.

(3) Defendant JOSEPH BIGICA issued a check in the amount of \$1,900, dated April 19, 2007, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for a Straw Contribution, which check was endorsed by STRAW CONTRIBUTOR 8.

(4) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 8 to issue a check in the amount of \$2,300, dated April 20, 2007, drawn on an account in the name of STRAW CONTRIBUTOR 8 made payable to the Committee.

STRAW CONTRIBUTOR 9

(f) Acts involving STRAW CONTRIBUTOR 9 [STRAW CONTRIBUTOR 8's daughter]:

(1) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 9 to issue a check in the amount of \$4,000, dated March 31, 2006, drawn on an account in the names of STRAW CONTRIBUTOR 9 made payable to the Committee.

(2) Defendant JOSEPH BIGICA issued a check in the amount of \$4,000, dated April 4, 2006, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was endorsed by STRAW CONTRIBUTOR 9.

STRAW CONTRIBUTOR 10 and STRAW CONTRIBUTOR 11

(g) Acts involving STRAW CONTRIBUTOR 10 [STRAW CONTRIBUTOR 8's daughter] and STRAW CONTRIBUTOR 11 [STRAW CONTRIBUTOR 10's spouse]:

(1) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 10 to issue a check in the amount of \$8,000, dated March 31, 2006, drawn on an account in the names of STRAW CONTRIBUTOR 10 and STRAW CONTRIBUTOR 11 made payable to the Committee.

(2) Defendant JOSEPH BIGICA issued a check in the amount of

\$8,000, dated April 4, 2006, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was endorsed by STRAW CONTRIBUTOR 10.

STRAW CONTRIBUTOR 12 and STRAW CONTRIBUTOR 13

(h) Acts involving STRAW CONTRIBUTOR 12 [STRAW CONTRIBUTOR 8's daughter] and STRAW CONTRIBUTOR 13 [STRAW CONTRIBUTOR 12's spouse]:

(1) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 12 to issue a check in the amount of \$8,000, dated March 31, 2006, drawn on an account in the names of STRAW CONTRIBUTOR 12 and STRAW CONTRIBUTOR 13 made payable to the Committee.

(2) Defendant JOSEPH BIGICA issued a check in the amount of \$8,000, dated April 4, 2006, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was endorsed by STRAW CONTRIBUTOR 12.

STRAW CONTRIBUTOR 14 and STRAW CONTRIBUTOR 15

(i) Acts involving STRAW CONTRIBUTOR 14 [an associate of defendant JOSEPH BIGICA] and STRAW CONTRIBUTOR 15 [STRAW CONTRIBUTOR 14's spouse]:

(1) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 14 to issue a check in the amount of \$8,000, dated March 30, 2006, drawn on an account in the names of STRAW CONTRIBUTOR 14 and STRAW CONTRIBUTOR 15 made payable to the Committee.

(2) Defendant JOSEPH BIGICA issued a check in the amount of \$8,000, dated April 4, 2006, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was endorsed by STRAW CONTRIBUTOR 14.

STRAW CONTRIBUTOR 16 and STRAW CONTRIBUTOR 17

(j) Acts involving STRAW CONTRIBUTOR 16 [an associate of STRAW CONTRIBUTOR 14] and STRAW CONTRIBUTOR 17 [STRAW CONTRIBUTOR 16's spouse]:

(1) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 16 to issue a check in the amount of \$8,000, dated March 31, 2006, drawn on an account in the names of STRAW CONTRIBUTOR 16 and STRAW CONTRIBUTOR 17 made payable to the Committee.

(2) Defendant JOSEPH BIGICA issued a check in the amount of \$8,000, dated April 4, 2006, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was endorsed by STRAW CONTRIBUTOR 16.

STRAW CONTRIBUTOR 18 and STRAW CONTRIBUTOR 19

(k) Acts involving STRAW CONTRIBUTOR 18 [an associate of STRAW CONTRIBUTOR 14] and STRAW CONTRIBUTOR 19 [STRAW CONTRIBUTOR 18's spouse]:

(1) Defendant JOSEPH BIGICA caused STRAW CONTRIBUTOR 18 to issue a check in the amount of \$8,000, dated March 30, 2006, drawn on an account in the names of STRAW CONTRIBUTOR 18 and

STRAW CONTRIBUTOR 19 made payable to the Committee.

(2) Defendant JOSEPH BIGICA issued a check in the amount of \$8,000, dated April 4, 2006, drawn on a bank account in the name of one of the Bigica Companies made payable to cash to provide money for Straw Contributions, which check was endorsed by STRAW CONTRIBUTOR 18.

In violation of Title 18, United States Code, Section 371.


PAUL J. FISHMAN
United States Attorney