

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Jose L. Linares
	:	
v.	:	Crim. No. 09-913 (JLL)
	:	
LORI SERRANO	:	18 U.S.C. §§ 641 and 2
	:	

S U P E R S E D I N G 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:

1. At all times relevant to this Superseding Information:
 - a. Defendant LORI SERRANO was a candidate for election to the City Council of Jersey City, New Jersey ("JC Council") in the Spring of 2009. The election was held on or about May 12, 2009, and defendant LORI SERRANO did not prevail.
 - b. There was an individual cooperating with law enforcement ("the CW"), who held himself out as a real estate developer interested in development in the Jersey City area.
2. At all times relevant to this Superseding Information:
 - a. Defendant LORI SERRANO ran for a JC Council seat on the ticket of a certain Mayoral candidate. The ticket included a slate of other candidates for public office who joined together to, among other things, raise funds for and defray the costs of

their campaigns (hereinafter referred to as the "Campaign Committee").

b. There was a treasurer of the Campaign Committee (hereinafter, the "Treasurer") who, among other things, was responsible for operating the Campaign Committee's election fund, which collected contributions made as to one and all candidates on the ticket and defrayed the expenses of those candidates. The Treasurer established a campaign depository or bank account at Capital One Bank in Jersey City, into which all campaign receipts were to be deposited.

3. At all times relevant to this Superseding Information:

a. The laws of the State of New Jersey, i.e., the Campaign Contributions and Expenditures Reporting Act, N.J. Stat. Ann. §§ 19:44A-1 et seq., and N.J.A.C. 19:25-1 et seq., required the treasurer of a candidate committee to, among other things: (i) make an accurate written record of all contributions made to the committee; (ii) deposit all contributions (not transferred to another committee or candidate) in a campaign depository or bank account; and (iii) report the receipt of cash contributions, regardless of amount, as well as all other contributions exceeding \$300, to the New Jersey Election Law Enforcement Commission ("ELEC") on forms issued by ELEC.

b. In addition, pursuant to N.J. Stat. Ann. 19:44A-1 et seq., N.J.A.C. 19:25-1 et seq., and their common-law obligations

as fiduciaries of a campaign committee, campaign treasurers and candidates for office were under a duty to their respective campaign committees to, among other things, honestly and truthfully account for the committees' receipts and to not use any such committee funds for any improper purpose or expenditure. The State of New Jersey prohibited the personal use of campaign funds.

4. From in or about March 2009 through in or about May 2009, in Hudson County, the District of New Jersey and elsewhere, defendant

LORI SERRANO

did knowingly and intentionally convert to her own use and the use of another, up to \$1,000 in money of the United States to which she was not entitled.

5. Defendant LORI SERRANO accepted cash contributions from the CW that were provided and owned by, and under the care, custody and control of, a U.S. Government department and agency, namely the Federal Bureau of Investigation, on or about March 30, 2009 and on or about April 23, 2009, in Bayonne, New Jersey. Defendant LORI SERRANO accepted those cash contributions with the intent to convert up to \$1,000 of those contributions to the use of another without the authority of the Campaign Committee.

6. Defendant LORI SERRANO failed truthfully to account to the Campaign Committee for the receipt of the CW's contributions

and, instead, did knowingly and intentionally convert, while in New Jersey, up to \$1,000 of those contributions to pay her own campaign expenses, with the intent to deprive the Campaign Committee and its members of the use, benefit and control of those contributions.

In violation of Title 18, United States Code, Sections 641 and 2.

Paul J. Fishman/rah

PAUL J. FISHMAN
United States Attorney

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SUPERSEDING INFORMATION FOR

18 U.S.C. §§ 641 & 2

PAUL J. FISHMAN

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