

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 10-  
 :  
 v. : 18 U.S.C. § 1951(a)  
 :  
 MICHAEL SCHAFFER : 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:

Conspiracy to Obstruct Commerce by Extortion  
under Color of Official Right

1. At all times relevant to this Information, defendant MICHAEL SCHAFFER was an associate of Peter Cammarano III and a Commissioner on the North Hudson Utilities Authority.

2. At all times relevant to this Information, Peter Cammarano III was an at-large Councilman for the City of Hoboken, New Jersey ("Hoboken") and candidate for the position of Mayor of Hoboken. On or about May 12, 2009, as one of the two top vote getters, Peter Cammarano III qualified for a run-off election for the mayoral position. On or about June 9, 2009, Peter Cammarano III was elected Mayor of Hoboken and was sworn in on or about July 1, 2009. Peter Cammarano III previously was elected to the Hoboken City Council in 2005. Defendant MICHAEL SCHAFFER supported, and actively participated in, the mayoral campaign of Peter Cammarano III.

3. At all times relevant to this Information, Edward Cheatam was the affirmative action officer for Hudson County and a Commissioner on the Jersey City Housing Authority. At certain times relevant to this Information, Edward Cheatam also was the Vice President of the Jersey City Board of Education.

4. At all times relevant to this Information, there was an individual, now deceased, who owned and operated a consulting firm based in Jersey City (the "Consultant").

5. At all times relevant to this Information, there was a cooperating witness (the "CW") who, at the direction of the Federal Bureau of Investigation ("FBI"), held himself out to be a real estate developer interested in development in the greater Hoboken 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.

6. From in or about April 2009 to in or about July 2009, in Hudson County, in the District of New Jersey and elsewhere, defendant

MICHAEL SCHAFFER

did knowingly and willfully conspire and agree with Peter Cammarano III, Edward Cheatam, the Consultant and others to obstruct, delay and affect interstate commerce by extortion under color of official right - that is, by obtaining illicit cash campaign contributions that were paid and to be paid by another,

with that person's consent, in exchange for Peter Cammarano III's future official assistance, action and influence in Hoboken Government matters.

7. It was the object of the conspiracy that defendant MICHAEL SCHAFFER accepted illicit cash campaign contributions from the CW that defendant Peter Cammarano III had agreed to accept in exchange for Peter Cammarano III's future official assistance, action and influence in Hoboken Government matters pertaining to the CW's purported real estate development projects.

8. It was part of the conspiracy that defendant MICHAEL SCHAFFER accepted a total of approximately \$25,000 (\$5,000 on or about April 27, 2009, \$5,000 on or about May 8, 2009, \$5,000 on or about May 19, 2009, and \$10,000 on or about July 16, 2009) in such illicit cash campaign contributions from the CW on behalf of defendant PETER CAMMARANO III.

9. It was part of the conspiracy that defendant MICHAEL SCHAFFER wrote checks to the mayoral campaign of Peter Cammarano III financed by the cash that he accepted from the CW in order to conceal the origin of the illicit cash campaign contributions made by the CW.

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



PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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

**UNITED STATES OF AMERICA**

v.

**MICHAEL SCHAFFER**

**INFORMATION FOR**

**18 U.S.C. § 1951(a)**

**PAUL J. FISHMAN  
U.S. ATTORNEY  
NEWARK, NEW JERSEY**

**BRADLEY A. HARSCH  
ASSISTANT U.S. ATTORNEY  
NEWARK, NEW JERSEY  
(973) 645-2700**