

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Criminal No. 14-\_\_\_\_  
 :  
 CHANNEL LESPINASSE : 18 U.S.C. § 1951(a)

INFORMATION

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

Introduction

1. At certain times relevant to this Information:
  - a. Defendant CHANNEL LESPINASSE was a Corrections Officer with the Essex County Correctional Facility ("Essex County Jail") in Newark, New Jersey.
  - b. D.H., a co-conspirator not named as a defendant herein, resided in Newark, New Jersey.
  - c. There was a cooperating witness ("CW-1") who was a federal pretrial detainee at the Essex County Jail.
  - d. The Essex County Jail was a facility in New Jersey that held federal pretrial detainees by direction of, or pursuant to, a contract or agreement with the United States Attorney General.

The Conspiracy

2. From in or about August 2013 through in or about January

2014, in Essex County, in the District of New Jersey, defendant

CHANNEL LESPINASSE

did knowingly and intentionally conspire and agree with D.H. and others to obstruct, delay, and affect interstate commerce by extortion under color of official right, by accepting corrupt payments that were paid and to be paid by another, with that person's consent, in exchange for CHANNEL LESPINASSE's official action and assistance in violation of her official duties at the Essex County Correctional Facility as specific opportunities arose.

Object of the Conspiracy

3. The object of the conspiracy was for LESPINASSE to receive payments in exchange for smuggling contraband, including cellular telephones, into the Essex County Jail for distribution to inmates.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. D.H. retrieved contraband, including a cellular telephone manufactured outside of New Jersey, to be smuggled into the Essex County Jail by defendant CHANNEL LESPINASSE, in exchange for payment.

b. D.H. received cash payments in Newark, New Jersey, for defendant CHANNEL LESPINASSE's assistance in smuggling contraband into the Essex County Jail.

c. Defendant CHANNEL LESPINASSE received the cash

payments and contraband from D.H. in Newark, New Jersey.

d. Defendant CHANNEL LESPINASSE smuggled the contraband into the Essex County Jail and delivered it to inmates, including CW-1.

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

### FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendant CHANNEL LESPINASSE, that upon conviction of the offense charged in this Information, the government will seek forfeiture in the amount of \$1,000 in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offense to forfeit any property constituting or derived from proceeds traceable to such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other

property of defendant CHANNEL LESPINASSE up to the value of the  
forfeitable property described in paragraph 2.

Paul J. Fishman/rah

PAUL J. FISHMAN

United States Attorney

CASE NUMBER: 14-

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District of New Jersey

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UNITED STATES OF AMERICA

v.

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INFORMATION FOR

18 U.S.C. § 1951(a)

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PAUL J. FISHMAN

*U. S. ATTORNEY*

*NEWARK, NEW JERSEY*

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