

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 17-  
 :  
 v. : 18 U.S.C. § 1951(a)  
 :  
 BENNIE ANDERSON : 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 Information:

a. Defendant BENNIE ANDERSON was an employee at the Jersey City Tax Assessor's office in Jersey City, New Jersey. By virtue of his employment, defendant BENNIE ANDERSON had the ability to change improperly the tax descriptions for properties in Jersey City without going through the required process to do so. The tax descriptions, which were publicly available, referenced how a property was zoned -- for example, whether it was a two-unit or three-unit dwelling. In the normal course, in order to change a property's tax description, the property owner would have to seek approval from the Jersey City Zoning Board. The Tax Assessor's office would change the tax description only if the Zoning Board approved a zoning variance.

b. There was an individual who was cooperating with law enforcement and who was a Jersey City property owner whose

property was zoned for a two-unit dwelling ("Individual 1"). Individual 1 presented as someone who wanted the tax description of Individual 1's property changed to reflect a three-unit dwelling, without gaining approval for such a change from the Jersey City Zoning Board. Individual 1's business activity in relation to Individual 1's property affected interstate commerce.

2. From on or about December 9, 2012 to on or about December 13, 2012, in Hudson County, in the District of New Jersey and elsewhere, defendant

BENNIE ANDERSON

did knowingly and willfully attempt to obstruct, delay and affect interstate commerce by extortion under color of official right by seeking to obtain and obtaining a corrupt cash payment of \$300 from Individual 1 in exchange for defendant BENNIE ANDERSON's official assistance, action and influence in changing the tax description of Individual 1's property.


3. It was a part of this extortionate activity that:

a. On or about December 12, 2012, in Jersey City, defendant BENNIE ANDERSON agreed to change the tax description for Individual 1's property from two units to three units in exchange for a cash payment.

b. On or about December 13, 2012, in Jersey City,

New Jersey, defendant BENNIE ANDERSON told Individual 1 that he had changed the tax description for Individual 1's property from two units to three units. For taking this official action, BENNIE ANDERSON accepted \$300 in United States currency from Individual 1.

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

  
WILLIAM E. FITZPATRICK  
Acting United States Attorney