

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Criminal No. 18-  
 :  
 FRANCIS RAIA and : 18 U.S.C. § 371  
 DIO BRAXTON :  
 :

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

**Introduction**

1. At all times relevant to this Indictment:
  - a. Defendant Francis Raia (“RAIA”) was a resident of Hoboken, New Jersey. RAIA was a candidate for the Hoboken City Council and was on the ballot for the November 5, 2013 municipal election in Hoboken (the “November 5 Election”). RAIA ran as part of a slate that included other candidates for Hoboken City Council and a candidate for Hoboken Mayor (the “Slate”). RAIA also was the Chairperson of a Political Action Committee (the “PAC”) that took positions on ballot referenda in Hoboken.
  - b. Defendant Dio Braxton (“BRAXTON”) was a resident of Hoboken, New Jersey.
  - c. Lizaida Camis (“Camis”) was a resident of Hoboken, New Jersey.
  - d. The ballot for the November 5 Election included a

referendum on whether Hoboken should maintain its existing rent control protections (the “Rent Control Referendum”).

e. BRAXTON, Camis, and others worked for RAIA to promote the Slate and a yes vote on the Rent Control Referendum.

f. Voter 1, Voter 2, and Voter 3 all resided in Hoboken and were registered to vote in Hoboken.

g. Under New Jersey law, a registered voter was permitted to cast a ballot by mail rather than in person. In Hudson County, where Hoboken is located, to receive a mail-in ballot, a voter completed and submitted to the Hudson County Clerk’s Office (“Clerk’s Office”) an Application for Vote By Mail Ballot (“VBM Application”). After the VBM Application was accepted by the Clerk’s Office, the voter received through either the U.S. mail or by hand delivery a mail-in ballot, a Certificate of Mail-in Voter, and a ballot envelope.

2. From at least as early as in or about October 2013 to at least as late as in or about November 2013, in Hudson County, in the District of New Jersey, and elsewhere, defendants

**FRANCIS RAIA and  
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knowingly and intentionally combined, conspired, confederated, and agreed with each other and others, including Camis, to commit an offense against the United States, that is, to knowingly and intentionally use the mail with the intent to promote, manage, establish, carry on, and facilitate the promotion,

management, establishment, and carrying on of an unlawful activity, that is, bribery, contrary to N.J.S.A. §§ 2C:27-2(a) and 19:34-25(a), and thereafter perform and attempt to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of the unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

### **Object of the Conspiracy**

3. The object of the conspiracy was to bribe voters by paying them to apply for and cast mail-in ballots in support of the Slate and a yes vote on the Rent Control Referendum.

### **Manner and Means of the Conspiracy**

4. It was part of the conspiracy that:
- a. At RAIA's direction, BRAXTON, Camis, and others promised voters, including Voter 1, Voter 2, and Voter 3, that they would be paid approximately \$50 by check if they submitted a mail-in ballot for the November 5 Election.
  - b. Certain of the co-conspirators gave voters VBM applications and caused the voters' completed VBM Applications to be delivered to the Clerk's Office.
  - c. Some of these voters received mail-in ballots via U.S. mail.
  - d. Certain of the co-conspirators visited voters at their

residences in Hoboken and instructed them to vote for the Slate and to vote yes on the Rent Control Referendum.

e. BRAXTON and others altered some of the ballots to ensure that the ballots were cast for the Slate and a yes vote on the Rent Control Referendum.

f. BRAXTON, Camis, and others sent some of the completed mail-in ballots to the Clerk's Office via U.S. mail and delivered other mail-in ballots in person to the Clerk's Office.

g. The PAC, at RAIA'S direction, paid a company ("Entity 1") to print checks for voters.

h. After the November 5 Election, RAIA, BRAXTON, and others distributed \$50 checks to voters, including Voter 1, Voter 2, and Voter 3, at an office in Hoboken owned by RAIA (the "Office").

#### **Overt Acts**

5. In furtherance of the conspiracy and to effect its object, RAIA, BRAXTON, Camis, and their co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. In or about October 2013, RAIA instructed BRAXTON, Camis and others to promise voters that they would be paid approximately \$50 if they submitted a mail-in ballot for the November 5 Election.

b. In or about October 2013, at RAIA's direction, Camis promised Voter 1 that Voter 1 would receive a \$50 check in exchange for submitting a mail-in ballot.

c. In or about October 2013, at RAIA's direction, Camis promised Voter 2 that Voter 2 would receive a \$50 check in exchange for submitting a mail-in ballot.

d. In or about October 2013, at RAIA's direction, Camis promised Voter 3 that Voter 3 would receive a \$50 check in exchange for submitting a mail-in ballot.

e. Between in or about October 2013 and in or about November 2013, BRAXTON instructed Camis to deliver to BRAXTON any completed mail-in ballots that Camis collected from voters.

f. Between in or about October 2013 and in or about November 2013, BRAXTON sent some of the mail-in ballots that he collected from Camis to the Clerk's Office via the U.S. mail.

g. In or about November 2013, RAIA, BRAXTON, and others distributed checks from the PAC, written by Entity 1, to voters at the Office.

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

A TRUE BILL

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FOREPERSON

*Craig Carpenito*  
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CRAIG CARPENITO  
UNITED STATES ATTORNEY