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

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UNITED STATES OF AMERICA : Hon. Cathy L. Waldor  
 :  
 v. : Mag. No. 19-7011  
 :  
 WILLIAM ROJAS : **CRIMINAL COMPLAINT**

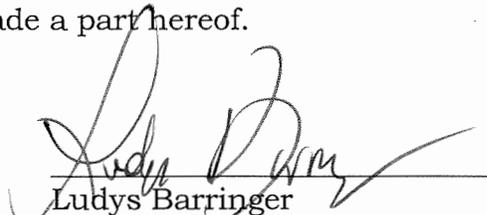
I, Ludys Barringer, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Ludys Barringer  
Special Agent  
FBI

Sworn to before me and subscribed in my presence,  
January 8, 2019, at Newark, New Jersey

  
\_\_\_\_\_  
Hon. Cathy L. Waldor  
United States Magistrate Judge

**ATTACHMENT A**

Between in or about September 2015 and in or about November 2015, in Hudson County, in the District of New Jersey, and elsewhere, defendant

WILLIAM ROJAS

knowingly and intentionally used and caused to be used 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 performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of the unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3) and Section 2.

## ATTACHMENT B

I, Ludys Barringer, am a Special Agent with the Federal Bureau of Investigation. I am aware of the facts contained herein based upon my own participation in this investigation, interviews and briefings with other law enforcement officers and interviews of witnesses. I also have reviewed publicly-available documents and reports, and other evidence, including election reports, voting records, and bank records. Because this complaint is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to me concerning this matter. Where I refer to the statements of others, those statements are related in substance and in part, unless otherwise noted. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint:
  - a. Defendant WILLIAM ROJAS ("ROJAS") was a resident of Hoboken, New Jersey, which is located in Hudson County. ROJAS worked for Candidate 1 in the November 2015 Hoboken municipal election (the "Election").
  - b. Voter 1, Voter 2, and Voter 3 each resided in Hoboken and was registered to vote in Hoboken.
  - c. Under New Jersey law, a registered voter was permitted to cast a ballot by mail rather than in-person. In Hudson County, to receive a mail-in ballot, a voter had to complete and submit 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 a mail-in ballot, a Certificate of Mail-in Voter, and a ballot envelope.

2. Between in or about September 2015 and in or about November 2015, on behalf of Candidate 1, ROJAS agreed to pay certain voters \$50 if those voters applied for and cast mail-in ballots in the Election. Three examples are set forth below.

3. According to Voter 1, in or about September 2015, ROJAS and another individual visited Voter 1 at Voter 1's residence and provided Voter 1 with a completed VBM Application, which Voter 1 signed and handed to ROJAS. In or about October 2015, ROJAS returned to Voter 1's residence with a completed mail-in ballot and instructed Voter 1 to sign the envelope into which the mail-in ballot was placed. The sealed mail-in ballot envelope was

mailed to the Clerk's Office, where it was received on or about October 24, 2015. Voter 1 stated that when ROJAS took the completed mail-in ballot, ROJAS promised Voter 1 that Voter 1 would receive a \$50 check after the Election.

4. According to bank records, on or about November 4, 2015, Voter 1 negotiated a \$50 check issued by a political action committee (the "PAC"). Voter 1 admitted that Voter 1 did not perform work for any campaign during the 2015 election cycle. Voter 1 further stated that Voter 1 was paid \$50 in exchange for voting by mail-in ballot in the Election, as directed by ROJAS.

5. According to Voter 2, in or about September 2015, ROJAS visited Voter 2 at Voter 2's residence and gave Voter 2 a VBM Application, which Voter 2 completed and returned to ROJAS. After collecting the VBM Application from Voter 2, ROJAS promised Voter 2 that, after the Election, Voter 2 would receive a \$50 check for casting a mail-in ballot. In or about October 2015, Voter 2 received a mail-in ballot, which Voter 2 completed and gave to ROJAS. The sealed mail-in ballot envelope was mailed to the Clerk's Office, where it was received on or about October 14, 2015.

6. According to bank records, on or about November 4, 2015, Voter 2 negotiated a \$50 check issued by the PAC. According to Voter 2, ROJAS delivered the check to Voter 2 at Voter 2's residence after the Election. Voter 2 admitted that Voter 2 did not perform work for any campaign during the 2015 election cycle. Voter 2 further stated that ROJAS paid \$50 to Voter 2 in exchange for voting by mail-in ballot in the Election, as directed by ROJAS.

7. According to Voter 3, in or about October 2015, ROJAS visited Voter 3 at Voter 3's residence and gave Voter 3 a VBM Application, which Voter 3 completed and returned to ROJAS. Voter 3 stated that ROJAS told Voter 3 that Voter 3 would receive a \$50 check if Voter 3 applied for and cast a mail-in ballot in the Election. In or about October 2015, Voter 3 completed a mail-in ballot and handed it to ROJAS. The sealed mail-in ballot envelope was mailed to the Clerk's Office, where it was received on or about October 13, 2015.

8. According to Voter 3, in or about November 2015, ROJAS delivered a \$50 check to Voter 3 at Voter 3's residence. Voter 3 admitted that Voter 3 did not perform work for any campaign during the 2015 election cycle. Voter 3 further stated that ROJAS paid \$50 to Voter 3 in exchange for voting by mail-in ballot in the Election, as directed by ROJAS.