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

UNITED STATES OF AMERICA : Hon. Steven C. Mannion
 :
 v. : Mag. No. 18-6194
 :
 LIZAIDA CAMIS : **CRIMINAL COMPLAINT**

I, Damian Salvati, 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 United States Department of Housing and Urban Development, Office of Inspector General ("U.S. HUD, OIG"), and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Damian Salvati
Special Agent
U.S. HUD, OIG

Sworn to before me and subscribed in my presence,
September 17, 2018, at Newark, New Jersey



Hon. Steven C. Mannion
United States Magistrate Judge

ATTACHMENT A

Between in or about October 2013 and in or about November 2013, in Hudson County, in the District of New Jersey, and elsewhere, defendant

LIZAIDA CAMIS

knowingly and intentionally used and caused to be used the mail and any facilities in interstate commerce 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, Damian Salvati, am a Special Agent with the United States Department of Housing and Urban Development, Office of Inspector General. I have personally participated in this investigation and 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. Defendants LIZAIDA CAMIS ("CAMIS") was a resident of Hoboken, New Jersey, which is located in Hudson County.
 - 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 October 2013 and in or about November 2013, CAMIS agreed to pay certain voters \$50 if those voters applied for and cast mail-in ballots for the November 2013 Hoboken municipal election (the "Election"). Three examples are set forth below.
3. According to Voter 1, in or about October 2013, CAMIS gave Voter 1 a VBM Application, which Voter 1 completed and returned to CAMIS. CAMIS then caused Voter 1's VBM Application to be delivered to the Clerk's Office. According to Voter 1, after CAMIS submitted Voter 1's VBM Application, CAMIS asked Voter 1 several times whether the mail-in ballot had arrived. In or about October 2013, Voter 1 received the mail-in ballot in the mail.

Thereafter, CAMIS visited Voter 1 at Voter 1's apartment in Hoboken. Voter 1 stated that CAMIS told Voter 1 which candidates to vote for and then took Voter 1's completed mail-in ballot. Voter 1 stated that when CAMIS took the completed mail-in ballot, CAMIS promised Voter 1 that Voter 1 would receive a \$50 check after the Election. Voter 1 stated that CAMIS told Voter 1 to pick up the check from an office located on Jefferson Street (the "Jefferson Street Office") in Hoboken after the Election. According to Voter 1, after the Election, Voter 1 went to the Jefferson Street Office and collected a \$50 check.

4. According to bank records, on or about November 7, 2013, Voter 1 negotiated a \$50 check issued by a company ("Entity 1") that purportedly provided payroll services to campaigns in Hoboken. Voter 1 admitted that Voter 1 did not perform work for any campaign during the 2013 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 CAMIS.

5. According to Voter 2, in or about October 2013, CAMIS gave Voter 2 a VBM Application, which Voter 2 completed and returned to CAMIS. CAMIS then caused Voter 2's VBM Application to be delivered to the Clerk's Office. In or about October 2013, after Voter 2 received a mail-in ballot, CAMIS came to Voter 2's apartment in Hoboken and collected it. Voter 2 stated that, when CAMIS took the mail-in ballot, CAMIS promised Voter 2 that Voter 2 would receive a \$50 check after the Election, which Voter 2 could pick up from the Jefferson Street Office. Voter 2 stated that, after the election, Voter 2 asked CAMIS if CAMIS could pick up Voter 2's check from the Jefferson Street Office and deliver it to Voter 2. According to Voter 2, CAMIS agreed to do so and hand-delivered the check to Voter 2 in or about November 2013.

6. According to bank records, on or about November 7, 2013, Voter 2 negotiated a \$50 check issued by Entity 1. Voter 2 admitted that Voter 2 did not perform work for any campaign during the 2013 election cycle. Voter 2 further stated that Voter 2 was paid \$50 in exchange for voting by mail-in ballot in the Election, as directed by CAMIS.

7. According to Voter 3, in or about October 2013, CAMIS gave Voter a VBM Application, which Voter 3 completed and returned to CAMIS. Voter 3 stated that CAMIS told Voter 3 that Voter 3 would receive a \$50 check if Voter 3 applied for a cast a mail-in ballot in the Election. CAMIS then caused Voter 3's VBM Application to be delivered to the Clerk's Office. In or about October 2013, the mail-in ballot arrived at Voter 3's apartment in Hoboken. Thereafter, CAMIS came to Voter 3's apartment, told Voter 3 which candidates to vote for, and then took Voter 3's completed mail-in ballot. Voter 3 stated that CAMIS told Voter 3 to pick up the \$50 check at the Jefferson Street Office.

8. According to bank records, on or about October 31, 2013, Voter 3 negotiated a \$50 check issued by a political action committee based in Hoboken. Voter 3 admitted that Voter 3 did not perform work for any campaign during the 2013 election cycle. Voter 3 further stated that Voter 3 was paid \$50 in exchange for voting by mail-in ballot in the Election, as directed by CAMIS.