

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 07-
 :
 v. : 18 U.S.C. §§ 1951(a) and 2
 :
 ALFRED E. STEELE : 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 that:

Attempted Extortion Under Color of Official Right

1. At all times relevant to this Information:

a. Defendant ALFRED E. STEELE: (i) represented the 35th District as an elected Assemblyman of the New Jersey General Assembly; and (ii) served as an Undersheriff for the Passaic County Sheriff's Department. As an Assemblyman, defendant ALFRED E. STEELE was in a position to use his official influence, and did use such influence, with (i) local government officials inside the district that he represented; and (ii) influential lawmakers and officials outside of his district.

b. Two cooperating witnesses ("CW-1" and "CW-2") and an undercover special agent ("UCA") of the Federal Bureau of Investigation ("FBI") purported to be representatives of Coastal Solutions, LLC, an FBI undercover company that was represented to be a company capable of providing insurance brokerage services to governmental entities (hereinafter, the "FBI Undercover

Company"). As represented by these individuals, the FBI Undercover Company was based in New Jersey, did business in various states, and paid for goods and services in interstate commerce.

2. From in or about April 2007 to in or about August 2007, on seven occasions which law enforcement authorities consensually recorded, defendant ALFRED E. STEELE accepted a total of \$15,500 in exchange for agreeing to use his official influence to assist in steering government insurance brokerage contracts to the FBI Undercover Company as follows:

a. On or about April 2, 2007, in Newark, New Jersey, defendant ALFRED E. STEELE accepted \$5,000 in cash from CW-2. In exchange, defendant ALFRED E. STEELE agreed to use his official influence to assist the FBI Undercover Company in securing an insurance brokerage contract from the Paterson School District.

b. On or about May 16, 2007, in Paterson, New Jersey, defendant ALFRED E. STEELE accepted \$1,500 in cash from the UCA. In exchange, defendant ALFRED E. STEELE agreed to use his official influence to assist the FBI Undercover Company in securing an insurance brokerage contract from the Paterson Housing Authority.

c. On or about May 24, 2007, in Orange, New Jersey, defendant ALFRED E. STEELE accepted \$1,500 in cash from the UCA in exchange for defendant ALFRED E. STEELE using his official

influence to assist the FBI Undercover Company in securing insurance brokerage contracts from the City of Orange.

d. On or about July 9, 2007, in Newark, New Jersey, defendant ALFRED E. STEELE accepted \$1,500 in cash from CW-2 in exchange for defendant ALFRED E. STEELE using his official influence to assist the FBI Undercover Company in securing insurance brokerage contracts from the City of Newark.

e. On or about August 2, 2007, in Passaic, New Jersey, defendant ALFRED E. STEELE accepted \$1,500 in cash from CW-2 for defendant ALFRED E. STEELE's past and continued official influence in attempting to secure an insurance brokerage contract for the FBI Undercover Company from the Paterson School District.

f. On or about August 13, 2007, in Clifton, New Jersey, defendant ALFRED E. STEELE accepted \$3,000 in cash from CW-2 in exchange for defendant ALFRED E. STEELE's official influence in attempting to secure insurance brokerage contracts for the FBI Undercover Company from the Newark Board of Education and the City of Passaic.

g. On or about August 20, 2007, in Elizabeth, New Jersey, defendant ALFRED E. STEELE accepted \$1,500 in cash from the UCA in exchange for his past and continued official influence in attempting to secure an insurance brokerage contract for the FBI Undercover Company from the City of Orange.

3. From on or about April 2007 to on or about August 2007, in Passaic, Essex and Union Counties, in the District of New Jersey and elsewhere, defendant

ALFRED E. STEELE

did knowingly and willfully attempt to obstruct, delay and affect interstate commerce by extortion - that is, by soliciting and accepting corrupt payments that were paid by another, with that person's consent, in exchange for defendant ALFRED E. STEELE's official influence and assistance in attempting to obtain government insurance brokerage contracts for the FBI Undercover Company as specific opportunities arose.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

CHRISTOPHER J. CHRISTIE
United States Attorney