

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No.
LOUIS SERVON MISTER : 18 U.S.C. §§ 666(a)(1)(B) &
1951(a) & § 2

INDICTMENT

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

COUNT 1

Conspiracy

1. At all times relevant to Count 1 of this Indictment:

a. Defendant LOUIS SERVON MISTER was the President of the Pleasantville Real Democratic Club, a political organization dedicated to electing public officials in and around Pleasantville, New Jersey.

b. Maurice Callaway ("Callaway") served as a member of the Pleasantville Board of Education (hereinafter "PBOE"). In his capacity as an elected board member, Callaway's duties included, but were not limited to, participating in the allocation of school district resources, establishing district policy and approving certain district expenditures and contracts, to include contracts for insurance brokerage services and roofing services.

c. Two cooperating witnesses ("CW-1" and "CW-2")

purported to be representatives of companies capable of providing insurance brokerage services (the "Insurance Brokerage Business") and roofing services (the "Roofing Business") to governmental entities. As represented by these individuals, these businesses were based in New Jersey, did business in various states, and paid for goods and services in interstate commerce.

2. From between in or about May 2006 to in or about June 2006, in Atlantic County, in the District of New Jersey and elsewhere, defendant

LOUIS SERVON MISTER

did knowingly and willfully conspire and agree with Maurice Callaway to obstruct, delay and affect interstate commerce by extortion under color of official right - that is, by agreeing to obtain and obtaining money that was paid by another, with that person's consent, for the benefit of Maurice Callaway, in exchange for Maurice Callaway's official action and influence as specific opportunities arose.

3. It was the object of the conspiracy that defendant LOUIS SERVON MISTER and Callaway accepted and agreed to accept corrupt cash payments from the CWs in exchange for Callaway's official action and influence in obtaining PBOE contracts and business for the CWs as specific opportunities arose, to include PBOE roofing contracts and business.

4. It was part of the conspiracy that on or about June 5,

2006, in Egg Harbor Township, New Jersey, defendant LOUIS SERVON MISTER, as Maurice Callaway's intermediary, accepted a corrupt cash payment of \$1,500 from CW-2, in the presence of, and at the direction of and on behalf of, Callaway.

5. It was further part of the conspiracy that, on or about June 5, 2006, approximately 2 to 3 hours after accepting the corrupt payment described in paragraph 4, defendant LOUIS SERVON MISTER accepted a second corrupt cash payment of \$1,500 from CW-2 at the direction, and on behalf of, Maurice Callaway.

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

COUNT 2

Attempted Obstruction of Interstate
Commerce by Extortion Under Color of Official Right

1. Paragraphs 1 and 3 to 5 of Count 1 are hereby incorporated and realleged as if fully set forth herein.

2. On or about June 5, 2006, in Atlantic County, in the District of New Jersey and elsewhere, defendant

LOUIS SERVON MISTER

did knowingly and willfully aid and abet an attempt to obstruct, delay and affect interstate commerce by extortion under color of official right - that is, by obtaining money on behalf of Maurice Callaway, that was paid by another, with that person's consent, in exchange for Callaway's official action and influence as specific opportunities arose.

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

COUNT 3

Acceptance of Corrupt Payments with
Intent to Influence and Reward a PBOE Official

1. Paragraphs 1 and 3 to 5 of Count 1 are hereby incorporated and realleged as if fully set forth herein.

2. The PBOE was a local government agency that received federal assistance in excess of \$10,000 during the relevant one-year period.

3. On or about June 5, 2006, in Atlantic County, in the District of New Jersey and elsewhere, defendant

LOUIS SERVON MISTER

did knowingly, willfully, and corruptly aid and abet the solicitation and demand for the benefit of Maurice Callaway, and the acceptance and agreement to accept from another, cash payments totaling approximately \$3,000 for the benefit of Callaway, with the intent for Callaway to be influenced and rewarded in connection with a business, transaction and series of transactions of the PBOE involving a thing of value of \$5,000 or more--to include PBOE roofing contracts and business.

In violation of Title 18, United States Code, Section 666(a)(1)(B) and Section 2.

FOREPERSON

CHRISTOPHER J. CHRISTIE
UNITED STATES ATTORNEY