

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 14-20102-CR-SCOLA **NALLE**

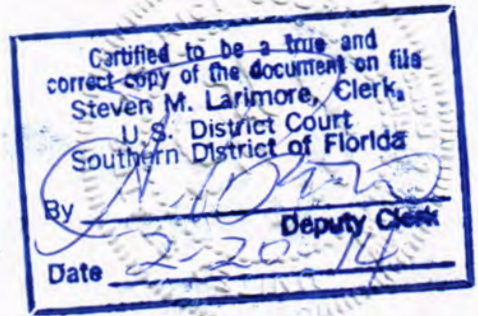
18 U.S.C. § 371
18 U.S.C. § 1001(a)(2)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441g
2 U.S.C. § 437g(d)(1)(A)(i)

UNITED STATES OF AMERICA

vs.

ANA ALLIEGRO,

Defendant.



INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times material to this Indictment:

**The Federal Election Commission
and Regulation of Federal Elections**

1. The Federal Election Campaign Act of 1971, as amended, Title 2, United States Code, Sections 431 through 455 (the "Election Act"), was a federal statute that was enacted to regulate federal election campaigns. The Election Act established the Federal Election Commission (FEC), an agency of the executive branch of the Government of the United States responsible for the administration and civil enforcement of the federal election and campaign finance laws.

2. Among the purposes of the Election Act was the identification and disclosure of all

persons and entities making contributions to candidates for federal office, the enforcement of limitations on the amount of such contributions, the prohibition against the receipt of contributions by any candidate or candidate's committee from corporate sources, the prohibition of contributions in excess of twenty-five hundred dollars (\$2,500) by any individual to any candidate or candidate's committee per federal election (in 2012), and the prohibition of contributions in excess of one hundred dollars (\$100) in United States currency by any individual to any candidate or candidate's committee per federal election.

3. The Election Act's contribution limits applied to anything of value provided for the purpose of influencing a Congressional election, including (a) contributions to a candidate and his/her campaign, and (b) expenditures made in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate or his/her campaign.

Federal Election Reporting Requirements

4. In order to implement the above provisions, the Election Act required the principal campaign committee of a candidate to file periodic campaign finance reports with the Federal Election Commission setting forth information concerning the source and expenditure of any campaign contributions. The required information was to be submitted by the Treasurer of the principal campaign committee to the Federal Election Commission on a FEC Form 3, entitled Report of Receipts and Disbursements for an Authorized Committee, and attached Schedules, hereinafter referred to as "FEC Form 3".

5. The FEC Form 3 specifically required the true and accurate identification of all contributors and the amount of such contributions, and the true and accurate identification of all recipients of any campaign expenditures and the amount of such expenditures. The FEC Form 3 further required a true and accurate identification of the source and amount of any loans to the

campaign.

6. The FEC Form 3s were made available to the public by the Federal Election Commission. These reports were intended to provide a transparent record of the source and amount of any contributions and the recipients and amounts of any disbursements.

The Candidacy of Justin Lamar Sternad

7. Justin Lamar Sternad was a candidate in the Democratic Party primary election for Florida's 26th Congressional District which was held on August 14, 2012.

8. On or about May 15, 2012, Justin Lamar Sternad signed a FEC Form 2 Statement of Candidacy and designated the "Justin Sternad for Congress" committee as his principal campaign committee for the Democratic Party primary election for Florida's 26th Congressional District. On or about July 10, 2012, Justin Lamar Sternad signed a second FEC Form 2 Statement of Candidacy and designated the "Lamar Sternad for Congress" committee as his principal campaign committee for the Democratic Party primary election for Florida's 26th Congressional District.

9. Justin Lamar Sternad was the Treasurer of the authorized campaign committees entitled "Justin Sternad for Congress" and "Lamar Sternad for Congress," both operating under FEC identification number C00505529.

COUNT 1

Conspiracy to Commit an Offense against the United States
(18 U.S.C. § 371)

1. The "General Allegations" portion of this Indictment is realleged and incorporated by reference as if fully set forth herein.

2. From an unknown date, but at least as early as in or about April 2012, until on or about August 29, 2012, in Miami-Dade County, in the Southern District of Florida, and elsewhere,

the defendant,

ANA ALLIEGRO,

did knowingly and willfully combine, conspire, confederate, and agree with at least one other person to commit an offense against the United States, that is, to knowingly and willfully:

(a) in a matter within the jurisdiction of the executive branch of the United States, make a materially false, fictitious, and fraudulent statement, in violation of 18 U.S.C. § 1001(a)(2);

(b) make contributions to a candidate for federal office, to wit, Justin Lamar Sternad, in excess of the limits of the Election Act, in violation of Title 2, United States Code, Section 441a(a)(1)(A), which contributions in calendar year 2012 exceeded the limits of the Election Act by \$25,000 or more, in violation of Title 2, United States Code, Section 437g(d)(1)(A)(i); and

(c) make contributions to a candidate for federal office, to wit, Justin Lamar Sternad, in excess of the limits of the Election Act, in violation of Title 2, United States Code, Section 441g, which contributions in calendar year 2012 exceeded the limits of the Election Act by \$25,000 or more, in violation of Title 2, United States Code, Section 437g(d)(1)(A)(i).

OBJECTIVE OF THE CONSPIRACY

3. The objective of the conspiracy was: to conceal the true source of the funds which were used by the political campaign of Justin Lamar Sternad during the Democratic Party primary contest of 2012 for Florida's 26th Congressional District; to secretly provide contributions in excess of the limits prescribed by the Election Act; and to conceal the existence of the conspiracy and the violations of the laws of the United States.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which defendant ANA ALLIEGRO and her co-conspirators sought to accomplish the objective of the conspiracy included, among others, the following:

4. Cash and checks were utilized to conceal the source and amount of contributions that were made to the campaign.

5. False and misleading FEC Form 3s were composed and filed with the Federal Election Commission in order to conceal the true source, amount, and nature of the funds used by the campaign.

OVERT ACTS

In furtherance of this conspiracy, and to accomplish its objective, at least one of the co-conspirators committed or caused to be committed, in the Southern District of Florida and elsewhere, at least one of the following overt acts, among others:

Initial Cash Contribution

6. In or about May, 2012, defendant ANA ALLIEGRO hand-delivered \$500, in cash, to co-conspirator Justin Lamar Sternad.

Qualifying Fee Contributions

7. On or about June 7, 2012, a deposit of \$5,000, in cash, was made into the account of "Justin Sternad for Congress", account number xxx-xxx1570, at a TD Bank branch in Washington, D.C.

8. On or about June 8, 2012, a deposit of \$5,500, in cash, was made into the account of "Justin Sternad for Congress", account number xxxxxx1570, at another TD Bank branch in Washington, D.C.

9. On or about June 8, 2012, check number 301, payable to the Department of State, in

the amount of \$10,440, drawn on the account of "Justin Sternad for Congress", account number xxxxxx1570 at TD Bank was provided to the Florida Department of State - Division of Elections with the notation "Qualifying Fee 2012."

10. On or about July 10, 2012, co-conspirator Justin Lamar Sternad signed and mailed a FEC Form 3 to the Federal Election Commission on behalf of the "Justin Sternad for Congress" committee but failed to report a contribution of \$5,000, in cash, which was received on June 7, 2012 and a contribution of \$5,500, in cash, which was received on June 8, 2012 by the "Justin Sternad for Congress" committee, TD Bank account number xxxxxx1570. Instead, co-conspirator Justin Lamar Sternad falsely claimed the aforementioned cash contributions were loans from his personal funds to the "Justin Sternad for Congress" committee.

Contribution for Car Rental

11. On or about July 2, 2012, defendant ANA ALLIEGRO deposited \$1,060, in cash, into the account of Justin Sternad, account number xxxxxx4360, at Wells Fargo Bank, N.A.

12. On or about July 2, 2012, co-conspirator Justin Lamar Sternad rented a motor vehicle from Enterprise Rent-A-Car to be used in his campaign for the Democratic Party primary election for Florida's 26th Congressional District.

Contributions for Printing & Mailing

13. In July, 2012, defendant ANA ALLIEGRO and a co-conspirator met with a graphic designer to develop flyers for the political campaign of co-conspirator Justin Lamar Sternad.

14. In July, 2012, defendant ANA ALLIEGRO hand-delivered \$2,600, in cash, to the graphic designer for the designer's work in developing the flyers.

15. On or about July 23, 2012, defendant ANA ALLIEGRO hand-delivered \$10,000, in cash, to Inkpressions, Inc. d/b/a Expert Printing & Graphics, the printer of the aforementioned

flyers.

16. From on or about July 17, 2012 through on or about July 24, 2012, approximately \$15,900, in cash, was delivered to Rapid Mail & Computer Service, Inc. for their services in mailing the aforementioned flyers.

17. On or about July 31, 2012, co-conspirator Justin Lamar Sternad signed and mailed a FEC Form 3 on behalf of the "Lamar Sternad for Congress" committee to the Federal Election Commission but failed to report the aforementioned contributions which were received between July 1, 2012 and July 25, 2012.

18. On or about August 2, 2012, a courier delivered \$5,000, in cash, to Inkpressions, Inc. d/b/a Expert Printing & Graphics.

19. In August, 2012, approximately \$22,100, in cash, was delivered to Rapid Mail & Computer Service, Inc. for their services in mailing the aforementioned flyers.

20. On or about August 9, 2012, a co-conspirator hand-delivered check number 8939, in the amount of \$13,824.85, payable to Expert Printing, drawn on account xxxxxx-9803 at BankUnited, to Inkpressions, Inc. d/b/a Expert Printing & Graphics.

21. On or about August 9, 2012, at the request of a co-conspirator, Inkpressions, Inc. d/b/a Expert Printing & Graphics issued check number 9998, in the amount of \$9,000, payable to Rapid Mail, which was subsequently delivered to Rapid Mail & Computer Service, Inc.

22. In or about August, 2012, defendant ANA ALLIEGRO advised co-conspirator Justin Lamar Sternad to claim on a FEC Form 3, which was filed on or about August 21, 2012, on behalf of the "Lamar Sternad for Congress" committee that: (a) on July 23, 2012, Justin Lamar Sternad loaned \$52,973.10 to the "Lamar Sternad for Congress" committee; (b) on July 23, 2012, the "Lamar Sternad for Congress" committee disbursed \$6,000 to Expert Printing; and (c) on July

24, 2012, the "Lamar Sternad for Congress" committee disbursed \$46,973.10 to Rapid Mail.

23. On or about August 21, 2012, co-conspirator Justin Lamar Sternad filed an amended FEC Form 3 which failed to accurately report the contributions which were received during the time period of between July 1, 2012 and July 25, 2012. Instead, co-conspirator Justin Lamar Sternad claimed on the amended FEC Form 3 filed on behalf of the "Lamar Sternad for Congress" committee that: (a) on July 23, 2012, Justin Lamar Sternad loaned \$52,973.10 to the "Lamar Sternad for Congress" committee; (b) on July 23, 2012, the "Lamar Sternad for Congress" committee disbursed \$6,000 to Expert Printing; and (c) on July 24, 2012, the "Lamar Sternad for Congress" committee disbursed \$46,973.10 to Rapid Mail.

All in violation of Title 18, United States Code, Section 371.

COUNT 2
False Statement
18 U.S.C. § 1001(a)(2)

1. The "General Allegations" portion of this Indictment is realleged and incorporated by reference as if fully set forth herein.

2. During the period from on or about August 15, 2012 through on or about August 21, 2012, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

ANA ALLIEGRO,

in a matter within the jurisdiction of the executive branch of the United States, knowingly and willfully aided and abetted and caused Justin Lamar Sternad to make a materially false, fictitious, and fraudulent statement and representation in that defendant ANA ALLIEGRO advised and counseled Justin Lamar Sternad to represent on a FEC Form 3 filed on behalf of the "Lamar

Sternad for Congress" committee with the Federal Election Commission that, on July 23, 2012, Justin Lamar Sternad loaned \$52,973.10 to the "Lamar Sternad for Congress" committee, when as ANA ALLIEGRO and Justin Lamar Sternad well knew and believed Justin Lamar Sternad had not loaned \$52,973.10, on July 23, 2012, to the "Lamar Sternad for Congress" committee.

In violation of Title 18, United States Code, Section 1001(a)(2) and Section 2.

COUNT 3

Illegal Campaign Contributions
2 U.S.C. §§ 441a(a)(1)(A) and 437g(d)(1)(A)(i)

1. The "General Allegations" portion of this Indictment is realleged and incorporated by reference as if fully set forth herein.

2. During calendar year 2012, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

ANA ALLIEGRO,

knowingly and willfully made and aided and abetted the making of contributions in excess of the \$2,500 limit of the Election Act, which, in aggregate, exceeded the limit of the Election Act by \$25,000 or more, to a candidate for federal office, to wit, Justin Lamar Sternad, with respect to the Democratic Party primary election for Florida's 26th Congressional District, which was held on August 14, 2012, in violation of Title 2, United States Code, Sections 441a(a)(1)(A) and 437g(d)(1)(A)(i) and Title 18, United States Code, Section 2.

COUNT 4
Illegal Campaign Contributions (Currency)
2 U.S.C. §§ 441g and 437g(d)(1)(A)(i)

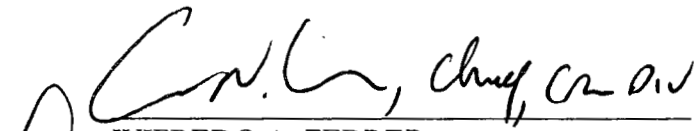
1. The "General Allegations" portion of this Indictment is realleged and incorporated by reference as if fully set forth herein.

2. During calendar year 2012, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,


ANA ALLIEGRO,

knowingly and willfully made and aided and abetted the making of contributions in excess of the \$100 limit on currency contributions of the Election Act, which, in aggregate, exceeded the limit of the Election Act by \$25,000 or more, to a candidate for federal office, to wit, Justin Lamar Sternad, with respect to the Democratic Party primary election for Florida's 26th Congressional District, which was held on August 14, 2012, in violation of Title 2, United States Code, Sections 441g and 437g(d)(1)(A)(i) and Title 18, United States Code, Section 2.

A TRUE BILL



WIFREDO A. FERRER
UNITED STATES ATTORNEY



THOMAS J. MULVIHILL
SENIOR LITIGATION COUNSEL
UNITED STATES ATTORNEY'S OFFICE