

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
v. : Criminal No.  
CRAIG WASK : Title 18, United States Code,  
Section 371

S U P E R S E D I N G I N F O R M A T I O N

The United States Attorney for the District of New  
Jersey charges:

COUNT ONE  
**(Conspiracy to Demand and Receive Unlawful Labor Payments -  
Title 18, United States Code, Section 371)**

Introduction

1. At all times relevant to this Superseding  
Information unless otherwise stated:

a. Defendant CRAIG WASK was employed by Local 825  
of the International Union of Operating Engineers (hereinafter  
"Local 825") as a business agent.

b. Local 825, headquartered in Springfield, New  
Jersey, was a "labor organization" as that term is defined in  
Title 29, United States Code, Sections 142(3), 152(5), 402(i) and  
(j). It represented, sought to represent, and would have  
admitted to membership construction equipment operators,  
mechanics, and surveyors. Local 825 represented approximately  
7,000 members, many of whom were employed at various construction  
projects in New Jersey and New York. Local 825, through its  
officers and agents, entered into collective bargaining

agreements (hereinafter "CBAs") with employers that employed operating engineers. These agreements contained provisions pertaining to conditions of employment, such as rates of pay and fringe benefits, and the circumstances under which an employer was obligated to man certain types of construction equipment, such as cranes, backhoes, forklifts, and booms, with Local 825 operating engineers, among other things.

c. Under Title 29, United States Code, Section 501(a), defendant CRAIG WASK and each officer, agent, and representative of Local 825 occupied a position of trust in relation to the union and its members as a group.

d. Kenneth P. Campbell, a co-conspirator not named as a defendant herein, was Local 825's Business Manager and was employed by the union.

e. Peter O. Strannemar, a co-conspirator not named as a defendant herein, was the President of Local 825 and was employed by the union.

f. A.M., a co-conspirator not named as a defendant herein, was a Local 825 lead engineer at various construction projects.

g. A company incorporated in New Jersey that engaged in the business of erecting steel (hereinafter "Steel Erector Company") employed operating engineers who were represented by and would be admitted to membership in Local 825.

h. A company incorporated in Delaware that engaged in the business of plumbing (hereinafter "Plumbing Company") employed operating engineers who were represented by and would be admitted to membership in Local 825.

i. A company headquartered in New York that engaged in the business of commercial window installation (hereinafter "Window Company") employed operating engineers who were represented by and would be admitted to membership in Local 825.

j. A company incorporated in New Jersey that engaged in the business of snow removal (hereinafter "Plow Company") employed operating engineers who were represented by and would be admitted to membership in Local 825. A.A., a co-conspirator not named as a defendant herein, was an employee of the Plow Company.

k. The Steel Erector Company, Plumbing Company, Window Company, and Plow Company were each "employers" as that term is defined in Title 29, United States Code, Sections 142 and 152(2), and the employees of these companies were employed in an industry affecting commerce.

**Construction Project in Jersey City, New Jersey**

2. Beginning as early as in or around 2000, a construction project had commenced to build a high-rise commercial building at 30 Hudson Street, Jersey City, New Jersey (hereinafter "Project One"). Each of the companies referred to in Paragraph 1(k) of this Count received contracts to work at Project One.

3. At all times relevant to this Superseding Information:

a. Each company referred to in Paragraph 1(k) of this Count was required to employ Local 825 members to operate construction equipment at the project.

b. Co-Conspirator A.M. was the lead engineer at Project One and was authorized to represent all the Local 825 members employed at Project One.

**The Conspiracy**

4. From in or around May 2001 to in or around July 2003, in the District of New Jersey and elsewhere, defendant

CRAIG WASK,

being an employee of Local 825, a labor organization, knowingly and willfully conspired and agreed with Co-Conspirators Kenneth P. Campbell, Peter O. Strannemar, A.M., A.A., and others to commit offenses against the United States, that is, to request, demand, receive, and accept, the payment, loan, and delivery of money and things of value, namely, United States currency in an

amount in excess of \$1,000, from employers, namely, the companies referred to in Paragraph 1(k) of this Count, whose employees were employed in an industry affecting commerce, namely, the construction industry, and whose employees such labor organization represented, sought to represent, and would have admitted to membership, contrary Title 29, United States Code, Sections 186(a)(2), (b)(1), and (d)(2).

#### **Object of the Conspiracy**

5. It was an object of the conspiracy that defendant CRAIG WASK and Co-Conspirators Kenneth P. Campbell, Peter O. Strannemar, and A.M. unlawfully requested and received cash payments and other things of value from employers at Project One, including Co-Conspirator A.A.

#### **Manner and Means of the Conspiracy**

##### **Steel Erector Company**

6. It was part of the conspiracy that Co-Conspirator A.M. demanded cash from the Steel Erector Company to ensure labor peace and in exchange for permitting the company to circumvent the CBA to which it was subject.

7. It was further part of the conspiracy that the Steel Erector Company delivered approximately \$4,000 in cash per month to Co-Conspirator A.M. In total, defendant CRAIG WASK and his co-conspirators obtained at least \$88,000 in cash from the Steel Erector Company.

### **Plumbing Company**

8. It was further part of the conspiracy that Co-Conspirator A.M. demanded and received cash payments from the Plumbing Company to ensure labor peace and in exchange for permitting the company to circumvent the CBA to which it was subject. In total, defendant CRAIG WASK and his co-conspirators obtained at least \$23,600 in cash from the Plumbing Company.

9. It was further part of the conspiracy that Co-Conspirators A.M. and Peter O. Strannemar requested and received household appliances, valued in excess of \$1,000, from the Plumbing Company.

### **Window Company**

10. It was further part of the conspiracy that Co-Conspirator A.M. demanded and received cash payments from the Window Company to ensure labor peace and in exchange for permitting the company to circumvent the CBA to which it was subject. In total, defendant CRAIG WASK and his co-conspirators obtained at least \$25,000 in cash from the Window Company.

### **Plow Company**

11. It was further part of the conspiracy that defendant CRAIG WASK and Co-Conspirator A.M. steered two contracts to the Plow Company to plow snow at Project One and an adjacent project.

12. It was further part of the conspiracy that Co-Conspirator A.A. gave defendant CRAIG WASK and Co-Conspirator A.M. approximately \$20,000 in cash and in checks for steering the two contracts to the Plow Company.

**Delivery of Unlawful Labor Payments**

13. It was further part of the conspiracy that after Co-Conspirator A.M., illegally obtained the cash from the Steel Erector Company, Plumbing Company, Window Company, and Plow Company, he kept some of the cash for himself and delivered the remaining cash to defendant CRAIG WASK.

14. It was further part of the conspiracy that defendant CRAIG WASK kept some of the illegally obtained cash for himself and delivered portions of the cash to Co-Conspirators Kenneth P. Campbell and Peter O. Strannemar.

### Overt Acts

15. In furtherance of the conspiracy and in order to effect the object thereof, defendant CRAIG WASK and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

#### Steel Erector Company

a. In or around June 2001, Co-Conspirator A.M. received at least \$1,000 in cash from the Steel Erector Company.

b. In or around April 2003, Co-Conspirator A.M. received approximately \$4,000 in cash from the Steel Erector Company.

#### Plumbing Company

c. On or about April 3, 2003, Co-Conspirator A.M. received approximately \$1,600 in cash from the Plumbing Company.

d. On or about May 22, 2003, Co-Conspirator A.M. received approximately \$1,000 in cash from the Plumbing Company.

#### Window Company

e. In or around 2002, Co-Conspirator A.M. demanded cash from the Window Company.

#### Plow Company

f. On or about July 8, 2003, Co-Conspirator A.A. caused a check to be issued from a third party to Co-Conspirator A.M. in the amount of \$5,000.

All in violation of Title 18, United States Code,



Section 371.

**COUNT TWO**  
**(Conspiracy to Demand and Receive Unlawful Labor Payments -  
Title 18, United States Code, Section 371)**

1. The allegations set forth in Paragraph 1 of Count One of this Superseding Information are hereby realleged as if set forth fully herein.

**Construction Project in Bergen County, New Jersey**

2. In or around 2003, a construction project had commenced to build a parking garage in Bergen County, New Jersey (hereinafter "Project Two"). The Steel Erector Company received a contract to work at Project Two.

3. In or around August 2003, in the District of New Jersey and elsewhere, defendant

CRAIG WASK,

being an employee of Local 825, a labor organization, knowingly and willfully conspired and agreed with the Steel Erector Company and others to commit offenses against the United States, that is, to request, demand, receive, and accept, the payment, loan, and delivery of money and things of value, namely, United States currency in an amount in excess of \$1,000, from the Steel Erector Company, an employer, whose employees were employed in an industry affecting commerce, namely, the construction industry, and whose employees such labor organization represented, sought to represent, and would have admitted to membership, contrary Title 29, United States Code, Sections 186(a)(2), (b)(1), and (d)(2).

### **Object of the Conspiracy**

4. It was an object of the conspiracy that defendant CRAIG WASK unlawfully requested and received approximately \$5,000 in cash from the Steel Erector Company.

### **Manner and Means of the Conspiracy**

5. It was part of the conspiracy that defendant CRAIG WASK demanded cash from the Steel Erector Company.

6. It was further part of the conspiracy that the Steel Erector Company gave defendant CRAIG WASK approximately \$5,000.

### **Overt Acts**

7. In furtherance of the conspiracy and in order to effect the object thereof, defendant CRAIG WASK and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. In or around the August 2003, defendant CRAIG WASK demanded cash from the Steel Erector Company.

b. In or around August 2003, defendant CRAIG WASK received approximately \$5,000 in cash from the Steel Erector Company.

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

**COUNT THREE**  
**(Conspiracy to Demand and Receive Unlawful Labor Payments -**  
**Title 18, United States Code, Section 371)**

1. The allegations set forth in Paragraph 1 of Count One of this Superseding Information are hereby realleged as if fully set forth herein.

2. G.V.C., a co-conspirator not named as a defendant herein, was the principal owner and operator of a construction company incorporated in New Jersey that employed operating engineers who were represented by and would be admitted to membership in Local 825. G.V.C.'s company was an "employer" as that term is defined in Title 29, United States Code, Sections 142 and 152(2), and the employees of this company were employed in an industry affecting commerce.

**Construction Project in Jersey City, New Jersey**

3. Beginning in or around 2000, a construction project had commenced to construct a large golf course with residential homes, among other things, in Jersey City, New Jersey (hereinafter "Project Three"). Co-Conspirator G.V.C.'s construction company was the General Contractor at Project Three and was responsible for subcontracting with all other construction companies at the project.

### The Conspiracy

4. From in or around May 2003 through in or around May 2006, in the District of New Jersey and elsewhere, defendant

CRAIG WASK,

being an employee of Local 825, a labor organization, knowingly and willfully conspired and agreed with Co-Conspirators Kenneth P. Campbell and G.V.C. and others to commit offenses against the United States, that is, to request, demand, receive, and accept, the payment, loan, and delivery of a thing of value, namely, United States currency in an amount in excess of \$1,000, from Co-Conspirator G.V.C., an individual acting on behalf of an employer, whose employees were employed in an industry affecting commerce, namely, the construction industry, and whose employees such labor organization represented, sought to represent, and would have admitted to membership, contrary to Title 29, United States Code, Sections 186(a)(2), (b)(1), and (d)(2).

### Object of the Conspiracy

5. It was an object of the conspiracy that defendant CRAIG WASK and his co-conspirators unlawfully requested and received in excess of \$100,000 in cash from Co-Conspirator G.V.C. to permit his company to use non-union labor at Project Three, contrary to the CBA, thereby saving his company a significant amount of money.

**Manner and Means of the Conspiracy**

6. It was part of the conspiracy that Co-Conspirator G.V.C.'s company, and certain of its subcontractors, employed non-union labor to operate construction equipment at Project Three, contrary to the CBA to which these companies were subject.

7. It was further part of the conspiracy that defendant CRAIG WASK requested cash payments from Co-Conspirator G.V.C. in exchange for permitting his company and certain of its subcontractors to use non-union labor at the project.

8. It was further part of the conspiracy that Co-Conspirator G.V.C. paid defendant CRAIG WASK between \$2,000 and \$4,000 in cash per month.

9. It was further part of the conspiracy that defendant CRAIG WASK kept some of these cash payments for himself and delivered portions of the cash to Co-Conspirator Kenneth P. Campbell.

**Overt Acts**

10. In furtherance of the conspiracy and in order to effect the object thereof, defendant CRAIG WASK and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. In or around May 2003, Co-Conspirator G.V.C. employed at least two individuals who were not members of Local 825 to operate construction equipment at Project Two.

b. In or around May 2003, Co-Conspirator G.V.C. delivered at least \$2,000 in cash to defendant CRAIG WASK.

c. In or around January 2004, Co-Conspirator G.V.C. delivered at least \$2,000 in cash to defendant CRAIG WASK.

d. In or around May 2006, Co-Conspirator G.V.C. delivered at least \$2,000 in cash to defendant CRAIG WASK.

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

**COUNT FOUR**

**(Conspiracy to Demand and Receive Unlawful Labor Payments - Title 18, United States Code, Section 371)**

1. The allegations set forth in Paragraph 1 of Count One of this Superseding Information are hereby realleged as if fully set forth herein.

**Construction Project in the Meadowlands, New Jersey**

2. As of in or around 2005, a construction project was underway near the Meadowlands, New Jersey (hereinafter "Project Four"). A company incorporated in New Jersey was contracted to work at the project (hereinafter "Company One"). Company One was required to employ Local 825 members to operate construction equipment at the project and was an "employer" as that term is defined in Title 29, United States Code, Sections 142 and 152(2).

3. At all times relevant to this Superseding Information, G.H., a co-conspirator not named as a defendant herein, was Local 825's lead engineer at Project Four and was authorized to represent all the Local 825 members employed at the project.



### **The Conspiracy**

4. From in or around early 2006 through in or around mid 2006, in the District of New Jersey and elsewhere, defendant

CRAIG WASK,

being an employee of Local 825, a labor organization, knowingly and willfully conspired and agreed with Co-Conspirator G.H., Company One, and others to commit offenses against the United States, that is, to request, demand, receive, and accept, the payment, loan, and delivery of a thing of value, namely, United States currency in an amount in excess of \$1,000, from Company One, an employer, whose employees were employed in an industry affecting commerce, namely, the construction industry, and whose employees such labor organization represented, sought to represent, and would have admitted to membership, contrary to Title 29, United States Code, Sections 186(a)(2), (b)(1), and (d)(2).

### **Object of the Conspiracy**

5. It was an object of the conspiracy that defendant CRAIG WASK and Co-Conspirator G.H. received a cash payment from Company One for steering a contract to the company.

### Manner and Means of the Conspiracy

6. It was part of the conspiracy that Co-Conspirator G.H. requested payments from Company One as a reward for steering a contract to Company One to work at Project Four.

7. It was further part of the conspiracy that Company One gave defendant CRAIG WASK and Co-Conspirator G.H. about \$13,000 in cash, which cash was delivered to them through a third party.

### Overt Acts

8. In furtherance of the conspiracy and in order to effect the object thereof, defendant CRAIG WASK and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. In or around early 2006, Co-conspirator G.H. requested money from Company One.

b. In or around mid-2006, defendant CRAIG WASK received approximately \$13,000 from Company One.

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

**COUNT FIVE**

**(Conspiracy to Demand and Receive Unlawful Labor Payments - Title 18, United States Code, Section 371)**

1. The allegations set forth in Paragraph 1 of Count One of this Superseding Information are hereby realleged as if fully set forth herein.

**Construction Project in Jersey City, New Jersey**

2. As of in or around 1999, a construction project was underway in Jersey City New Jersey (hereinafter "Project Five"). Blue Ridge Erectors, Inc. (hereinafter "Blue Ridge"), a steel erector company, was contracted to work at Project Five. Blue Ridge was required to employ Local 825 members to operate construction equipment at the project and was an "employer" as that term is defined in Title 29, United States Code, Sections 142 and 152(2).

3. At all times relevant to this Superseding Information, G.H. was Local 825's lead engineer at Project Five and was authorized to represent all the Local 825 members employed at the project.

**The Conspiracy**

4. From at least as early as in or around March 2001 to on or about August 14, 2002, in the District of New Jersey and elsewhere

CRAIG WASK,

being an employee of Local 825, a labor organization, knowingly and willfully conspired and agreed with Co-Conspirator G.H., Blue

Ridge, and others to commit offenses against the United States, that is, to request, demand, receive, and accept, the payment, loan, and delivery of a thing of value, namely, United States currency in an amount in excess of \$1,000, from Blue Ridge, an employer, whose employees were employed in an industry affecting commerce, namely, the construction industry, and whose employees such labor organization represented, sought to represent, and would have admitted to membership, contrary to Title 29, United States Code, Sections 186(a)(2), (b)(1), and (d)(2).

#### **Object of the Conspiracy**

5. It was an object of the conspiracy that defendant CRAIG WASK and Co-Conspirator G.H unlawfully requested and received at least \$58,000 from Blue Ridge to permit the company to circumvent the CBA to which it was subject, namely, the manning of welding machines.

#### **Manner and Means of the Conspiracy**

6. It was part of the conspiracy that Co-Conspirator G.H. requested money from Blue Ridge to permit the company to circumvent the CBA to which it was subject, namely, the requirement that Blue Ridge man its welding machines with at least one Local 825 operating engineer.

7. It was further part of the conspiracy that Blue Ridge placed a "no-show" employee on the company's payroll to facilitate the unlawful payments to Co-Conspirator G.H.

8. It was further part of the conspiracy that after causing the Blue Ridge payroll checks to be cashed, Co-Conspirator G.H. kept a portion of the cash for himself and gave a portion of the cash to defendant CRAIG WASK.

**Overt Acts**

9. In furtherance of the conspiracy and in order to effect the object thereof, defendant CRAIG WASK and his co-conspirators committed and caused to be committed the following overt act, among others, in the District of New Jersey and elsewhere:

a. One or about August 8, 2001, Co-Conspirator G.H. received a Blue Ridge check in the approximate amount of \$776.23.

b. On or about August 7, 2002, Co-Conspirator G.H. received a Blue Ridge check in the approximate amount of \$1,125.74.

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

**COUNT SIX**  
**(Conspiracy to Demand and Receive Unlawful Labor Payments - Title 18, United States Code, Section 371)**

1. The allegations set forth in Paragraph 1 of Count One and Paragraph 2 of Count Three of this Superseding Information are hereby realleged as if fully set forth herein.

2. At all times relevant to this Superseding Information, Local 825 admitted new members into the union. Co-Conspirator Kenneth P. Campbell was responsible for approving the admission of applicants into the union. After the applicant was admitted into the union, he or she was permitted to work at construction projects as a Local 825 operating engineer and was entitled to all the rights, privileges, and benefits concomitant with membership in the union.

**The Conspiracy**

3. From in or around August 2004 through in or around September 2004, in the District of New Jersey and elsewhere, defendant

CRAIG WASK,

being an employee of Local 825, a labor organization, knowingly and willfully conspired and agreed with Co-Conspirators Kenneth P. Campbell and G.V.C. to commit offenses against the United States, that is, to request, demand, receive, and accept, the payment, loan, and delivery of a thing of value, namely, United States currency in an amount in excess of \$1,000, from Co-

Conspirator G.V.C., an individual acting in the interest of an employer, whose employees were employed in an industry affecting commerce and whose employees such labor organization represented, sought to represent, and would have admitted to membership, contrary Title 29, United States Code, Sections 186(a)(2), (b)(1), and (d)(2).

#### **Objects of the Conspiracy**

4. It was an object of the conspiracy that Co-Conspirator G.V.C. unlawfully paid cash to defendant CRAIG WASK and Co-Conspirator Kenneth P. Campbell to obtain the admission of three of Co-Conspirator G.V.C.'s employees into Local 825.

5. It was further an object of the conspiracy that Co-Conspirator Kenneth P. Campbell admitted three of Co-Conspirator G.V.C.'s employees into Local 825, in exchange for cash, to the detriment of Local 825 and its membership.

#### **Manner and Means of the Conspiracy**

6. It was part of the conspiracy that Co-Conspirator G.V.C. paid at least \$6,000 in cash to defendant CRAIG WASK to obtain the admission of three of Co-Conspirator G.V.C.'s employees, including two relatives, into Local 825.

7. It was further part of the conspiracy that defendant CRAIG WASK delivered a portion of this cash to Co-Conspirator Kenneth P. Campbell.

8. It was further part of the conspiracy that Co-Conspirator Kenneth P. Campbell, in exchange for the cash payment from Co-Conspirator G.V.C., admitted these employees into Local 825.

**Overt Acts**

9. In furtherance of the conspiracy and in order to effect the objects thereof, defendant CRAIG WASK and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. In or around August 2004, Co-Conspirator G.V.C. gave at least \$6,000 in cash to defendant CRAIG WASK.

b. On or about August 5, 2004, Co-Conspirator Kenneth P. Campbell initialed a union document, thereby approving and permitting one of Co-Conspirator G.V.C.'s employees to be admitted into Local 825.

c. In or around August 2004, defendant CRAIG WASK delivered a portion of the cash that he had received from Co-Conspirator G.V.C. to Co-Conspirator Kenneth P. Campbell.

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



**COUNT SEVEN**  
**(Conspiracy to Demand and Receive Unlawful Labor Payments - Title 18, United States Code, Section 371)**

1. The allegations set forth in Paragraph 1 of Count One, Paragraph 2 of Count Four, and Paragraph 2 of Count Six of this Superseding Information are hereby realleged as if fully set forth herein.

**The Conspiracy**

2. In or around the summer of 2003, in the District of New Jersey and elsewhere, defendant

CRAIG WASK,

being an employee of Local 825, a labor organization, knowingly and willfully conspired and agreed with Co-Conspirators Kenneth P. Campbell and Company One to commit offenses against the United States, that is, to request, demand, receive, and accept, the payment, loan, and delivery of a thing of value, namely, United States currency in an amount in excess of \$1,000, from Company One, an employer, whose employees were employed in an industry affecting commerce and whose employees such labor organization represented, sought to represent, and would have admitted to membership, contrary Title 29, United States Code, Sections 186(a)(2), (b)(1), and (d)(2).

### **Objects of the Conspiracy**

3. It was an object of the conspiracy that Company One unlawfully paid cash to defendant CRAIG WASK and Co-Conspirator Kenneth P. Campbell to obtain the admission of at least two of Company One's employees into Local 825.

4. It was further an object of the conspiracy that Co-Conspirator Kenneth P. Campbell admitted at least two of Company One's employees into Local 825, in exchange for cash, to the detriment of Local 825 and its membership.

### **Manner and Means of the Conspiracy**

5. It was part of the conspiracy that Company One paid at least \$6,000 in cash to defendant CRAIG WASK to obtain the admission of two of Company One's employees into Local 825.

6. It was further part of the conspiracy that defendant CRAIG WASK delivered a portion of this cash to Co-Conspirator Kenneth P. Campbell.

7. It was further part of the conspiracy that Co-Conspirator Kenneth P. Campbell, in exchange for the cash payment from Company One, admitted these employees into Local 825.

Overt Acts

8. In furtherance of the conspiracy and in order to effect the objects thereof, defendant CRAIG WASK and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. In or around August 2003, Company One gave at least \$6,000 in cash to defendant CRAIG WASK.

b. In or around August 2003, Co-Conspirator Kenneth P. Campbell initialed a union document, thereby approving and permitting a Company One employee to be admitted into Local 825.

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

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CHRISTOPHER J. CHRISTIE  
United States Attorney