

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
v.	:	Criminal No. 12-
PATRICK VIOLA	:	Title 29, United States Code, Sections 186 and Title 18, United States Code, Section and 2

I N F O R M A T I O N
(Unlawfully Receiving a Prohibited Labor Payment)

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Introduction

1. At all times relevant to this Information:

The Defendant and Other Parties

a. Defendant PATRICK VIOLA was the Business Manager and an employee of Local 592 of the Laborers' International Union of North America (hereinafter "Local 592" and "LIUNA," respectively).

b. Local 592, headquartered in Edgewater, 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 402 (j). Local 592 represented, sought to represent, and would have admitted to membership laborers, who performed tasks, such as manual labor and demolition work, at various construction projects in New Jersey.

c. An individual (hereinafter the "Individual") was a representative of a construction company headquartered in New Jersey (hereinafter the "Company"). The Company, at various times, had collective bargaining agreements with LIUNA and, at various construction projects in New Jersey, hired workers represented by and whom would be admitted into membership of LIUNA.

Receipt of the Prohibited Labor Payment

2. On or about January 25, 2010, in Bergen County, New Jersey, the Individual met defendant PATRICK VIOLA. During this meeting, the Individual gave defendant PATRICK VIOLA approximately \$4,000 in cash to permit the Company to use non-union laborers at an upcoming construction project in Bergen County, New Jersey. After receiving the prohibited payment from the Individual, defendant PATRICK VIOLA stated the following, in substance and in part: "Yeah, well you do what you gotta do as far as I'm concerned. You going in there [the construction project], do it non-union, you do it non-union, that's the end of it." The Individual replied, "I'll do that one [the \$4,000 prohibited labor payment] in advance because I really can't afford to have any kinds of problems [at the construction project]."

The Charge

3. On or about January 25, 2010, in Bergen County, in the District of New Jersey and elsewhere

PATRICK VIOLA,

being an officer and employee of Local 592 of the Laborers' International Union of North America, a labor organization, unlawfully and willfully requested, demanded, received, and accepted, and agreed to receive and accept the payment of and delivery of a thing of value, namely, United States currency in an amount exceeding \$1,000, as described in Paragraph 2 of this Information, from an employer and a person acting in the interest of an employer, as described in Paragraph 1c of this Information, whose employees were employed in an industry affecting commerce and whom Local 592 would represent, seek to represent, and would admit to membership.

In violation of Title 29, United States Code, Sections 186(a)(2), (b)(1) and (d)(2), and Title 18, United States Code, Section 2.


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

PATRICK VIOLA

INFORMATION FOR

Title 29, United States Code, Section 186
Title 18, United States Code, Section 2

PAUL J. FISHMAN

U.S. ATTORNEY NEWARK, NEW JERSEY

ANTHONY MOSCATO
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-645-2752
