

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 14-
	:	
ANSELMO CRISONINO	:	18 U.S.C. §§ 641, 666(a)(1)(B),
	:	1955, and 2;
	:	26 U.S.C. § 7206(1)

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:

COUNT 1  
Bribery – 18 U.S.C. § 666(a)(1)(B)

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

a. Defendant ANSELMO CRISONINO (“defendant CRISONINO”)

served as the Senior Accountant of the City of Bayonne Department of Community Development (“CBDCD”) and was responsible for reviewing applications for United States Department of Housing and Urban Development (“HUD”) grant funds from the City of Bayonne and awarding such funds to qualified applicants.

b. The CBDCD was a local government agency that received funds in

excess of \$10,000 per year from HUD under a federal program that provided grants to low income families to rehabilitate their homes and to repair conditions that were considered to affect their health and safety, and their homes’ accessibility, energy efficiency or code compliance, up to an amount of \$20,000 per grant. The CBDCD also provided these HUD funds under the same

federal program to nonprofit organizations to rehabilitate their facilities and to repair conditions that were considered to affect their health and safety, and their facilities' accessibility, energy efficiency or code compliance.

2. In or about September 2010, defendant CRISONINO solicited cash payments from Joseph Arrigo ("Arrigo"), the owner of Shadow Contracting, in exchange for defendant CRISONINO's assistance in awarding to Arrigo HUD grant funds from the CBDCC. From in or about September 2010 to in or about February 2013, in Bayonne, defendant CRISONINO received a stream of cash payments from Arrigo totaling approximately \$65,000. In exchange, defendant CRISONINO awarded to Arrigo HUD grant funds from the CBDCC.

3. As a result of the cash payments received from Arrigo, and defendant CRISONINO's assistance in awarding HUD grant funds from the CBDCC, Shadow Contracting was awarded HUD Grant funds from the CBDCC totaling approximately \$426,000 from in or about September 2010 to in or about February 2013, ranging in amount from approximately \$1,500 to approximately \$65,000 per grant.

4. From in or about September 2010 to in or about February 2013, in the District of New Jersey, and elsewhere, defendant

ANSELMO CRISONINO

did knowingly and corruptly solicit and demand a stream of cash payments totaling approximately \$65,000 for the direct and indirect benefit of himself and did accept and agree to accept these payments intending to be influenced and rewarded in connection with a business,

transaction and series of transactions of the CBDCD involving things of value of \$5,000 and more.

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

Count 2  
Theft and Conversion of Government Funds – 18 U.S.C. §§ 641 and 2

1. Paragraph 1 of Count 1 of this Information is hereby incorporated and realleged as if fully set forth herein.

2. Between in or about September 2010 and in or about February 2013, defendant CRISONINO received competing bids from multiple contractors and plumbers for renovation projects funded by HUD grant funds. In many cases, the competing bids that were submitted for particular projects were within \$1,000 of each other and were known by defendant CRISONINO to be the result of improper collusion between the contractors and plumbers.

3. Defendant CRISONINO awarded the HUD grant funds to the contractors and plumbers despite the fact that defendant CRISONINO knew the bids for the projects were illegitimate and fraudulent.

4. In some instances, contractors and/or plumbers submitted change orders for projects that had exhausted the \$20,000 authorized by the CBDCD grant program. The change orders were submitted to allow for additional funds to be allotted to the same jobs, despite the fact that in many instances, little to no legitimate work had been performed at the job sites.

5. Defendant CRISONINO approved the change orders and awarded additional HUD grant funds for the projects despite the fact that defendant CRISONINO knew the change orders were illegitimate and fraudulent.

6. Between in or about September 2010 to in or about February 2013, in the District of New Jersey and elsewhere, defendant

ANSELMO CRISONINO

did knowingly embezzle, steal, purloin, and convert to his own use and the use of others, money of HUD, a department and agency of the United States, that is, approximately \$422,360 in grant funds to which he and others were not entitled.

In violation of Title 18, United States Code, Section 641 and Section 2.

Count 3  
Conducting an Illegal Gambling Business – 18 U.S.C. §§ 1955 and 2

1. Between at least in or about September 2010 and February 2013, a website (hereinafter the “Website”) was maintained by associates of defendant CRISONINO to profit through the operation of an illegal gambling business that operated in northern New Jersey and elsewhere contrary to N.J.S.A. 2C:37-2. Through the use of usernames and passwords, agents who administered and managed the operations of the illegal gambling business could access the Website and track the bets or wagers placed by their bettors. The “electronic portfolio” associated with the username and password was known as the agent’s “package.” The agent also had the ability, through the Website, to create packages for sub-agents, who operated under the agent, maintained their own bettors, had access to the Website related to their package, and were required to share their profits with the agent, and ultimately the other associates in the illegal gambling business. From at least approximately September 2010, to approximately February 2013, defendant CRISONINO operated as a sub-agent in the illegal gambling business, which involved at least five individuals who conducted, financed, managed, supervised, directed, and owned all or part of the business.

2. From at least in or about September 2010 to in or about February 2013, in Hudson County, in the District of New Jersey and elsewhere, defendant

ANSELMO CRISONINO

knowingly conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business that (a) operated in violation of Chapter 37 of Title 2C of New Jersey Statutes Annotated (N.J.S.A. 2C:37-2), (b) involved five and more persons who conducted,

financed, managed, supervised, directed, and owned all and part of such business, and (c) was in substantially continuous operation for a period in excess of thirty days and had a gross revenue of more than \$2,000 in any single day.

In violation of Title 18, United States Code, Section 1955(a) and Section 2.

Count 4  
Submitting False Tax Return – 16 U.S.C. § 7206(1)

1. Paragraphs 1 and 2 of Count 1 of this Information are hereby incorporated and realleged as if fully set forth herein.

2. On or about March 4, 2012, defendant CRISONINO signed and caused to be filed with the Internal Revenue Service (“IRS”) a U.S. Individual Income Tax Return, Form 1040, for tax year 2011. This Form 1040 contained written declarations that the return was signed under penalty of perjury. On this Form 1040, defendant CRISONINO claimed he earned a gross income of approximately \$100,879 from the CBD CD in tax year 2011, but intentionally failed to report approximately \$65,000 in additional income from bribe payments that he received from Joseph Arrigo.

3. On or about March 4, 2012 in the District of New Jersey, and elsewhere, defendant

ANSELMO CRISONINO

did knowingly and willfully make and subscribe a U.S. Individual Tax Return, Form 1040, for tax year 2011, which he did not believe to be true and correct as to every material matter, in that it falsely failed to disclose approximately \$65,000 in unreported income from bribery.

In violation of Title 26, United States Code, Section 7206(1).

*Paul J. Fishman/rah*

PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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18 U.S.C. §§ 641, 666, 1955 and 2;  
26 U.S.C. § 7206(1)

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**PAUL J. FISHMAN**  
*U.S. ATTORNEY*  
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