

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 14-
 :
 v. : 18 U.S.C. § 371
 :
 JOSEPH LADO :
 :
 : 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:

1. At all times relevant to this Information:
 - a. Defendant JOSEPH LADO ("defendant LADO") owned Lado Construction, LLC ("Lado Construction") a construction company located in Union City, New Jersey.
 - b. There were two individuals who were Inspectors (respectively, "Inspector 1" and "Inspector 2") at the Union City, New Jersey Community Development Agency ("UCCDA"). Inspector 1 and Inspector 2 were agents of a local government agency pursuant to 18 U.S.C. § 666(d)(1).
 - c. The UCCDA was a government agency that received funds from the United States Department of Housing and Urban Development ("HUD") well in excess of \$10,000 per year from in or about 2007 to at least in or about 2011 under a federal block grant that provided funding for, among other things, home improvement projects and sidewalk replacement projects. HUD required that all transactions be conducted in a manner providing full and open competition; the UCCDA policies and procedures stated that at least two cost estimates should have been solicited by the homeowners for the rehabilitation of residential properties and the replacement of

sidewalks; and New Jersey state law required the solicitation of at least two quotations, if practicable.

- d. Through agreements to rehabilitate residential properties that defendant LADO and Lado Construction entered into with the UCCDA, defendant LADO and Lado Construction were authorized to act on behalf of the UCCDA, a local government agency, and, therefore, were agents of a local government agency pursuant to 18 U.S.C. § 666(d)(1).
- e. There was an individual who owned a paving contracting company located in Jersey City, New Jersey (the "Contractor") with whom defendant LADO engaged in collusion with regard to sidewalk replacement projects and other construction projects through the UCCDA and the Board of Education for the Township of Weehawken, New Jersey.

The Conspiracy

2. Between in or about June 2007 and in or about September 2010, in Hudson County, in the District of New Jersey and elsewhere, defendant

JOSEPH LADO

did knowingly and intentionally conspire and agree with others, including the Contractor, Inspector 1 and Inspector 2, to obtain by fraud, otherwise without authority knowingly convert to his use and the use of others, and intentionally misapply, funds owned by and under the care, custody and control of the UCCDA, with a value of \$5,000 and more, specifically at least more than \$70,000, contrary to Title 18, United States Code, Section 666(a)(1)(A).

3. It was the object of the conspiracy that defendant LADO and others, including the Contractor, Inspector 1 and Inspector 2, would collude to rig the process for selecting contractors to obtain projects from the UCCDA by submitting false and materially misleading proposals to rig the selection process in favor of particular contractors, including, on many occasions, Lado Construction.

4. It was part of the conspiracy that:

A. Between in or about June 2007 and in or about November 2010, defendant LADO caused the Contractor (i) on many occasions to provide defendant LADO with phony proposals from the Contractor's company that were higher than defendant LADO's own proposals and (ii) on other occasions, to provide defendant LADO with blank proposal forms for the Contractor's company that defendant LADO later completed with the help of another, listing amounts that were higher than Lado Construction's proposals for the same work. Under both of these scenarios, defendant LADO then would submit the Contractor's company's phony proposals and his own to the UCCDA in order to obtain projects, and ultimately, HUD grant funds, from the UCCDA for the completion of the projects.

B. Between in or about June 2007 and in or about November 2010, Inspector 1 would fraudulently complete blank proposal forms for the Contractor's company in amounts higher than those of the Contractor's company's competitors in order to secure HUD-funded

sidewalk replacement and residential improvement projects for certain contractors, including defendant LADO and Lado Construction, from the UCCDA.

C. Between in or about April 2007 and in or about September 2010, at the request of Inspector 1 and Inspector 2, defendant LADO also provided both Inspector 1 and Inspector 2 with phony proposals for amounts higher than his competitors for projects that Inspector 1 and Inspector 2 had predetermined that defendant LADO and Lado Construction would not win in order to ensure that other contractors secured these projects.

Overt Acts

5. In furtherance of the conspiracy and to effectuate the objects thereof, defendant LADO and his coconspirators committed the following overt acts in the District of New Jersey and elsewhere:

- a. On or about July 10, 2010, defendant LADO caused the Contractor to complete a phony proposal in the amount of \$5,300 for a sidewalk replacement project located on 39th Street in Union City.
- b. On or about July 14, 2010, defendant LADO caused the Contractor to complete a phony proposal in the amount of \$5,900 for a sidewalk replacement project located on 22nd Street in Union City.
- c. On or about July 14, 2010, defendant LADO caused the Contractor to complete a phony proposal in the amount of \$6,950 for a sidewalk replacement project located on Summit Avenue in Union City.

In violation of Title 18, United States Code, Section 371.

Paul J. Fishman/rah

PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: _____

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INFORMATION FOR

Title 18, United States Code, Section 371

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