

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
PANTALEO PELLEGRINI,	:	18 U.S.C. § 666(a)(1)(A)
a/k/a “Leo Pellegrini”	:	18 U.S.C. § 2
	:	26 U.S.C. § 7206(1)

INFORMATION

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

COUNT 1

(Scheme to Embezzle from the City of Hoboken)

Background

1. At all times relevant to this Information:
 - a. Defendant PANTALEO PELLEGRINI, a/k/a “Leo Pellegrini,” was employed by the City of Hoboken. PELLEGRINI worked as the Director of the Department of Health and Human Services and the Director of the Department of Environmental Services.
 - b. The City of Hoboken was an organization, government, or agency that receives, in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of Federal assistance.
 - c. In connection with his employment with the City of Hoboken, PELLEGRINI had oversight over the City of Hoboken’s Division of Cultural Affairs;

Division of Health; Division of Parks, Recreation & Public Works; Division of Rent Leveling and Stabilization; and Division of Senior Services.

d. In connection with his oversight over the City of Hoboken's Division of Parks, Recreation & Public Works, PELLEGRINI had oversight responsibilities related to certain public recreational facilities. The public recreational facilities over which PELLEGRINI had oversight responsibility, including recreational fields, could be reserved by third-party entities for a fee paid to the City of Hoboken. PELLEGRINI had authority to, among other things, reserve certain public recreational facilities on behalf of third-party entities, subject to the availability of the facilities and payment of appropriate fees to the City of Hoboken.

e. In connection with his employment with the City of Hoboken, PELLEGRINI was required to: (i) disclose his own outside employment and business interests, (ii) file annual conflict of interest forms, and (iii) file annual state-mandated financial disclosure forms. The City of Hoboken's conflict of interest policy prohibited PELLEGRINI from having an ownership interest in any business or engaging in any business activity that had a substantial conflict with his duties as an employee with the City of Hoboken.

The Scheme to Embezzle from the City of Hoboken

2. From in or around March 2017 to in or around October 2022, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**PANTALEO PELLEGRINI,
a/k/a “Leo Pellegrini”**

being an agent of an organization, and of a State and local government, and any agency thereof, namely, the City of Hoboken, embezzled, stole, obtained by fraud, and otherwise without authority knowingly converted to the use of persons other than the rightful owner, and intentionally misapplied property valued at \$5,000 and more that was owned by, and was under the care, custody, and control of the City of Hoboken.

Manner and Means of the Scheme

The Pellegrini Private Soccer Club

3. During the relevant period, PELLEGRINI was the owner and president of a private travel soccer club open to Hoboken residents and non-Hoboken residents (the “Pellegrini Private Soccer Club”). The Pellegrini Private Soccer Club was funded by tuition from participants, and PELLEGRINI was the sole signatory on a bank account associated with the Pellegrini Private Soccer Club. An IRS Form SS-4 associated with the Pellegrini Private Soccer Club was filed in 2017, and the Pellegrini Private Soccer Club was required to file an annual report with the New Jersey Department of Treasury. According to public records, the Pellegrini Private Soccer Club has never filed an annual report or any tax filings, and its nonprofit status was revoked in 2023.

4. During the relevant period, the City of Hoboken Department of Parks, Recreation & Public Works sponsored a nonprofit recreation soccer league open to all Hoboken residents aged 5 to 13 (the “Youth Soccer League”). The Youth Soccer League received funding from the City of Hoboken and from participant registration fees. As director of the City of Hoboken’s Department of Health and Human Services, PELLEGRINI had oversight responsibility for the Youth Soccer League.

5. During the relevant period, an adult soccer league open to both Hoboken and non-Hoboken residents (the “Adult Soccer League”) operated in the City of Hoboken. The Adult Soccer League, as a private entity, received funding from participant registration fees, but did not receive funding from the City of Hoboken.

6. Beginning in or around 2017, the Adult Soccer League sought to reserve City of Hoboken public recreational facilities for which it was required to pay a fee to the City of Hoboken. PELLEGRINI, having oversight responsibilities over such payments, reserved public recreational facilities on behalf of the Adult Soccer League. PELLEGRINI was required to deposit any fees paid by the Adult Soccer League into a bank account associated with the City of Hoboken.

7. Instead, PELLEGRINI diverted payments from the Adult Soccer League intended for the City of Hoboken to a business account controlled by PELLEGRINI and on which he was a signatory (the “Pellegrini Soccer Business Account”) and which was associated with a soccer-related entity (the “Pellegrini Soccer Business Entity”). At various times, PELLEGRINI told an individual who operated the Adult Soccer League (“Individual-1”) to sign checks for the rental of

public recreation facilities but instructed Individual-1 to leave the payee line of the checks blank for PELLEGRINI to fill in later. PELLEGRINI later filled in the name of the Pellegrini Soccer Business Entity on these checks and deposited the checks into the Pellegrini Soccer Business Account, rather than into a City of Hoboken account, without the knowledge of Individual-1.

8. For example, pursuant to this scheme, PELLEGRINI diverted the following checks from the Adult Soccer League from the City of Hoboken to the Pellegrini Soccer Business Account:

Check Date (Approx.)	Dollar Amount (Approx.)
3/24/17	\$7,000
6/27/17	\$10,000
3/9/18	\$6,000
8/14/18	\$10,000
7/30/19	\$10,000
11/1/19	\$10,000
8/20/20	\$10,500
11/5/20	\$11,000
4/18/21	\$12,000
6/10/21	\$8,000

9. In total, PELLEGRINI diverted at least approximately \$190,000 due to the City of Hoboken to the Pellegrini Soccer Business Account.

The Misappropriated Purchase Orders

10. During the relevant period, PELLEGRINI submitted or caused the submission to the City of Hoboken numerous invoices associated with expenses incurred by the Pellegrini Private Soccer Club, which PELLEGRINI falsely or fraudulently represented to the City of Hoboken as invoices eligible for reimbursement by the City of Hoboken. As a result, the City of Hoboken—at

PELLEGRINI's direction—unwittingly paid tens of thousands of dollars to the Pellegrini Private Soccer Club's vendors for the Pellegrini Private Soccer Club's expenses, and also unknowingly paid tens of thousands of dollars directly to PELLEGRINI through the Pellegrini Private Soccer Club.

11. For example, pursuant to this scheme, invoices in the following amounts were paid by the City of Hoboken to the Pellegrini Private Soccer Club's vendors for the Pellegrini Private Soccer Club's expenses:

Invoice Date (Approx.)	Dollar Amount (Approx.)
2/13/18	\$2,920
7/9/18	\$10,275
3/6/20	\$20,745
12/22/20	\$5,255

12. In total, the City of Hoboken unknowingly paid at least approximately \$110,000 to the Pellegrini Private Soccer Club's vendors for the Pellegrini Private Soccer Club's expenses, or directly to PELLEGRINI through the Pellegrini Private Soccer Club.

13. During the relevant period, PELLEGRINI filed annual disclosure statements which failed to disclose his affiliation with or interest in the Pellegrini Private Soccer Club, or the receipt of funds associated with the Pellegrini Soccer Business Account or the misappropriated purchase orders.

14. As a result of PELLEGRINI's conduct, PELLEGRINI caused a loss to the City of Hoboken of at least approximately \$439,972.60.

In violation of Title 18, United States Code, Section 666(a)(1)(A) and Section 2.

COUNTS 2-7

(Making and Subscribing False Personal Tax Returns)

15. The allegations set forth in paragraphs 1 and 3 through 14 of this Information are hereby realleged and incorporated as if fully set forth herein.

16. At all times relevant to this Information, the Internal Revenue Service (“IRS”) was an agency of the United States Department of the Treasury, responsible for administering and enforcing the tax laws of the United States, and collecting the taxes that were due and owing to the Treasury of the United States by its citizens and businesses.

17. On or about the dates below, PELLEGRINI signed, filed, and caused to be filed with the IRS, United States Individual Income Tax Returns, Forms 1040, for the calendar years listed below on his behalf (the “Tax Returns”), that were not true and correct as to every material matter.

18. PELLEGRINI intentionally did not disclose and report a significant portion of his income from the above-described embezzlement scheme for calendar years 2017, 2018, 2019, 2020, 2021, and 2022, thereby causing the Tax Returns to understate a substantial amount of the income that he received for each of these tax years. By failing to report approximately \$457,932.60 in income for calendar years 2017 through 2022, PELLEGRINI failed to pay approximately \$119,454.00 in additional federal income taxes due and owing to the United States.

19. The Tax Returns were signed by PELLEGRINI and each contained a written declaration that the particular tax return was signed under penalties of perjury.

20. On or about the dates listed, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

**PANTALEO PELLEGRINI,
a/k/a “Leo Pellegrini”**

willfully did make and subscribe and file with the IRS, the Tax Returns for the calendar years set forth below, each of which contained and was verified by a written declaration that it was made under the penalties of perjury, and which PELLEGRINI did not believe to be true and correct as to every material matter reported therein, as described in paragraph 18 of this Information.

Count	Date Filed (On or About)	Calendar Year	Unreported Income (Approx.)	Tax Due & Owing (Approx.)
2	4/15/18	2017	\$100,125.00	\$31,266.00
3	11/2/19	2018	\$80,020.00	\$20,609.00
4	7/27/20	2019	\$101,678.00	\$25,158.00
5	4/15/21	2020	\$70,944.60	\$17,063.00
6	4/15/22	2021	\$92,020.00	\$22,249.00
7	10/16/23	2022	\$13,145.00	\$3,109.00

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

FORFEITURE ALLEGATION

1. Upon conviction of the offense in in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2, as charged in Count 1 of this Information, defendant

**PANTALEO PELLEGRINI,
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shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(c), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such violation, including, but not limited to, a sum of money equal to \$439,972.60 in United States currency, representing proceeds of the offense charged in Count 1 of this Information.

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above

forfeitable property.


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: _____

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UNITED STATES OF AMERICA

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**PANTALEO PELLEGRINI,
a/k/a “Leo Pellegrini”**

INFORMATION FOR

18 U.S.C. § 666(a)(1)(A)

18 U.S.C. § 2

26 U.S.C. § 7206(1)

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