

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

UNITED STATES OF AMERICA	:	Hon. André M. Espinosa
	:	
v.	:	Mag. No. 26-11057
	:	
RUSSELL FALLACARA	:	CRIMINAL COMPLAINT

I, Joseph Patricola, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

/s/ Joseph Patricola

Task Force Officer Joseph Patricola
Federal Bureau of Investigation

Task Force Officer Patricola attested to
this Complaint by telephone pursuant to
FRCP 4.1(b)(2)(A).

Sworn to and subscribed via telephone,
this 19th day of March, 2026

DISTRICT OF NEW JERSEY
County and State

HONORABLE ANDRÉ M. ESPINOSA
UNITED STATES MAGISTRATE JUDGE

/s/ Hon. André M. Espinosa

Signature of Judicial Officer

ATTACHMENT A

Count 1

Conspiracy to Commit Honest Services Fraud

From in or about January 2022 through in or about February 2024, the defendant,

RUSSELL FALLACARA,

did knowingly and intentionally conspire and agree with Individual-1 and others to devise and execute a scheme and artifice to defraud Hudson County of the right to the honest services of FALLACARA and others in the affairs of Hudson County, and to transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds for the purpose of executing such scheme and artifice, contrary to Title 18, United States Code, Sections 1343 and 1346.

In violation of Title 18, United States Code, Section 1349.

Count 2
Conspiracy to Commit Money Laundering

From in or about January 2022 through in or about February 2024, the defendant,

RUSSELL FALLACARA,

did knowingly and intentionally conspire and agree with Individual-1 and others to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, namely, conspiracy to commit honest services fraud, in violation of Title 18, United States Code, Section 1349, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i).

In violation of Title 18, United States Code, Section 1956(h).

ATTACHMENT B

I, Joseph Patricola, a Task Force Officer with the Federal Bureau of Investigation (“FBI”), having personally participated in an investigation of the conduct of defendant Russell Fallacara (“FALLACARA”) and others, having reviewed, among other materials, law enforcement records and databases, telephone records, surveillance photographs, electronic communications, and bank records, and having spoken with other law enforcement officers and individuals, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the statements and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged. Dollar amounts, and other figures cited herein, are approximations.

RELEVANT INDIVIDUALS AND ENTITIES

1. At all times relevant to this Criminal Complaint:
 - a. FALLACARA served as Director of the Hudson County, New Jersey Parks Department (the “Parks Department”).
 - b. Individual-1 was a co-conspirator who owned a contracting company (“Company-1”) that served as a vendor for Hudson County, including for the Parks Department. Company-1 performed over \$5 million of work for Hudson County. That work included various services for the Parks Department, including but not limited to landscape maintenance, paving, and general contracting work.
 - c. Hudson County had an intangible right to the honest services of its officials. As a Hudson County official, FALLACARA owed Hudson County a duty to refrain from seeking, soliciting, demanding, accepting, and agreeing to accept bribes and kickbacks in exchange for action and assistance as an official of Hudson County and for his violation of his official duties in connection with the affairs of Hudson County.
 - d. A cooperative was a purchasing system utilized by Hudson County in which a local contracting unit (a “Local Contracting Unit”) advertised for bids and awarded contracts to vendors that were registered with the Local Contracting Unit. Under a cooperative purchasing agreement, the contract-awarding process for contracts whose value did not exceed \$17,500 was shorter than that of the standard bidding process and required less work by Hudson County.
 - e. Company-1 was the Local Contracting Unit’s only awarded vendor for repair and maintenance – job order contracting. Thus, when the Parks

Department used the Local Contracting Unit for work that qualified as “repair and maintenance – job order contracting,” the work would be awarded to Company-1.

f. During his tenure as Parks Department Director, FALLACARA was involved in pricing all Parks Department contracting work; played a significant role in the contracting process relating to the Parks Department; and approved “change orders,” or extra bills submitted by vendors, as well as emergency contracts.

OBJECT OF THE CONSPIRACY

2. It was an object of the conspiracy for Individual-1 to pay bribes and kickbacks to FALLACARA in exchange for FALLACARA and other Hudson County officials taking official action including approving contracts and/or adding false expenses to contracts or invoices submitted to Hudson County by Individual-1.

MANNER AND MEANS OF THE CONSPIRACY

3. It was part of the conspiracy that:

a. Since in or around 2018, Company-1 performed over \$5 million of work for Hudson County. Some of Company-1’s contracts with Hudson County were awarded pursuant to the standard bidding process but most of Company-1’s work for Hudson County was pursuant to a series of cooperative purchasing agreements.

b. Beginning in or around 2022, FALLACARA—while serving as Parks Director—participated in a bribe and kickback scheme with Individual-1, in which Individual-1 paid bribes and kickbacks, directly and indirectly, to FALLACARA in exchange for FALLACARA taking official action with regard to approving contracts awarded to Company-1 by Hudson County, and approving invoices that were submitted by Company-1 to Hudson County. These bribes and kickbacks included, but were not limited to, over \$400,000 in cash payments to FALLACARA.

c. On occasion, Individual-1 and FALLACARA took steps to conceal the corrupt nature of these financial transactions. For example, in or around January 2023, Individual-1 provided an associate of FALLACARA’s with a check for \$300,000, issued from Company-1’s bank account. The associate then provided Individual-1 with \$300,000 in cash, which Individual-1 then gave to FALLACARA. This \$300,000 payment was given to FALLACARA in exchange for FALLACARA having taken official action with regard to approving contracts awarded to Company-1 by Hudson County.

d. Further, in or around Summer 2023, Individual-1 provided FALLACARA with free repairs and renovations to FALLACARA's residence, including the residence's pool, basement, and backyard, in exchange for FALLACARA's continued official assistance to Company-1.

e. In or about July 2023, in an attempt to conceal the corrupt arrangement between FALLACARA and Individual-1, FALLACARA provided Individual-1 with a check for approximately \$54,000, issued from the bank account of a family member of FALLACARA, which was purportedly payment for the aforementioned work performed at FALLACARA's residence. Shortly thereafter, Individual-1 provided FALLACARA with the value of that check in cash.

f. In total, the value of the bribes and kickbacks paid by Individual-1 to FALLACARA and others in the conspiracy was more than \$1,000,000.

g. FALLACARA, Individual-1, and others used various interstate wire transmissions to further and facilitate their scheme, including but not limited to e-mails and text messages. For example, on or about June 14, 2023, FALLACARA and Individual-1 exchanged text messages relating to the free home renovations that were being performed at FALLACARA's residence.