

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 21-  
 :  
 v. : Hon.  
 :  
 PAUL IDROVO, a/k/a : 18 U.S.C. § 371  
 "Jose Diaz" and "Paul Mejia" :

**INFORMATION**

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

**(Conspiracy to Defraud the United States and to Commit Extortion by a United States Employee)**

1. At all times relevant to this Information:

**Background**

a. Paul Idrovo ("P. IDROVO"), also known as "Jose Diaz," and "Paul Mejia," was an authorized trainer for Outreach Training Programs ("OTP") for the United States Department of Labor, Occupational Safety and Health Administration ("OSHA"), but not an employee of OSHA. An OTP teaches workers in construction and general industry how to identify and avoid common safety and health risks in the workplace. OSHA-authorized trainers conduct 10-hour courses for entry-level workers, and 30-hour courses for supervisors or workers with safety responsibilities.

b. Alvaro Idrovo ("A. Idrovo"), a co-conspirator not charged in this Information, was the brother of P. IDROVO and was employed by OSHA as a

Compliance Safety and Health Officer (“CSHO”) performing routine and complex safety and health investigations at assigned job sites. Among other things, this position required that A. Idrovo accurately identify hazards during on-site inspections, develop and gather all pertinent facts to document and properly classify violations, evaluate safety and health programs, and make appropriate recommendations for improvement when deficiencies were noted.

c. OSHA was a federal agency created by the United States Congress in the Occupational Safety and Health Act of 1970 to ensure safe and healthy working conditions for workers by setting and enforcing standards and by providing outreach, education, and assistance.

d. Contractor Nos. 1 to 3 were construction companies that operated in New Jersey.

### **The Conspiracy**

2. From on or about December 4, 2019 through on or about May 15, 2020 in Essex, Bergen, Hudson, and Morris Counties, in the District of New Jersey, and elsewhere, defendant

**PAUL IDROVO,  
a/k/a “Jose Diaz” and “Paul Mejia,”**

did knowingly and intentionally conspire and agree with A. Idrovo, (1) to defraud the United States by impairing, impeding, and obstructing the lawful function of OSHA to insure safe and healthy conditions for workers by setting and enforcing standards free from deceit, craft, trickery, corruption and dishonesty, and (2) to commit an offense against the United States, specifically to commit acts of extortion

under color or pretense of office or employment against contractors in New Jersey, while A. Idrovo was an employee of OSHA, and assumed to act as such, contrary to Title 18, United States Code, Section 872.

### **Goal of the Conspiracy**

3. It was a goal of the conspiracy for P. IDROVO and A. Idrovo to unlawfully enrich themselves by misrepresenting to contractors that the contractors would incur significant OSHA fines and penalties if the contractors did not pay excessive and unnecessary sums to P. IDROVO, for purported, but in fact fraudulent, safety training certificates for OSHA training courses and health and safety plans, which unlawfully collected monies P. IDROVO shared with A. Idrovo, thereby impairing, impeding, and obstructing the ability of OSHA to set and enforce standards free from deceit, craft, trickery, corruption and dishonesty.

### **Manner and Means of the Conspiracy**

4. The manner and means by which P. IDROVO and A. Idrovo sought to accomplish the goal of the conspiracy included, among other things, the following:

- a. A. Idrovo used his position at OSHA to falsely warn certain contractors engaged at construction sites in New Jersey that they were facing significant fines from OSHA for alleged safety violations if the contractors did not get OSHA safety training from a specific individual.
- b. A. Idrovo supplied a phone number to the contractors, allegedly for the required OSHA trainer named "Jose Diaz," or "Paul Mejia," but which phone number in fact belonged to P. IDROVO.

c. P. IDROVO and A. Idrovo discussed and agreed upon the number of employees and the nature of the safety training that would be covered by the fraudulent training certificates as well as the amount they would charge each contractor for the certificates and health and safety plans.

d. P. IDROVO communicated the fees demanded for this paperwork to the contractors and finalized the payment amount that would be collected from the contractors.

e. P. IDROVO produced fraudulent computer-generated safety training certificates for individual employees of each contractor which falsely stated that these employees had received various types of OSHA certified safety training, including ladder, personal protective equipment, and fire safety training, and that this training had been provided by Jose Diaz or Paul Mejia.

f. P. IDROVO generated safety and health plans for the contractors which were taken from a template rather than created or modified in any substantial way to fit the needs and circumstances of the individual contractors.

g. P. IDROVO provided the false certificates and health and safety plans to contractors in exchange for the demanded payments of between \$4,000 to \$6,000, which payments P. IDROVO and A. Idrovo required to be in cash.

h. P. IDROVO gave approximately \$5,000 of the cash payments to A. Idrovo along with copies of the fraudulent paperwork that P. IDROVO supplied to the contractors.

i. A. Idrovo submitted fraudulent paperwork to OSHA, including fraudulent safety training certificates, purporting to show safety measures carried out by a contractor, as part of A. Idrovo's official OSHA reports.

**Overt Acts**

5. In furtherance of the conspiracy and to effect its goals, the following overt acts were committed in New Jersey, and elsewhere:

a. On or about December 13, 2019, A. Idrovo sent a text message to P. IDROVO alerting him that Contractor No. 1, who had received an OSHA violation with respect to a construction site in Chatham, New Jersey, would be calling P. IDROVO regarding personal protective equipment ("PPE") and fall protection safety training.

b. On or about December 13, 2019, P. IDROVO, using the name "Paul Mejia," told Contractor No. 1 that Contractor No. 1 needed to pay \$4,000 in cash to P. IDROVO for alleged necessary PPE and fall safety certificates and a health and safety plan, but that Contractor No. 1 should not be concerned about not actually receiving any training.

c. On or about December 16, 2019, P. IDROVO (i) collected \$4,000 in cash from Contractor No. 1's wife in Elizabeth, New Jersey and (ii) gave her ten computer-generated certificates which falsely represented that five workers of Contractor No. 1 had received OSHA certified PPE and fall protection safety training from "Paul Mejia," an alleged OSHA construction trainer, on December 14 and 15, 2019.

d. In January 2020, A. Idrovo told Contractor No. 2 that Contractor No. 2 was guilty of three ladder violations at a work site in Kearny, New Jersey, and that, in order to make these OSHA violations go away or reduce the fine, Contractor No. 2 needed to get safety training from a specific trainer, whose phone number A. Idrovo supplied.

e. On or about January 17, 2020, A. Idrovo sent a text message to P. IDROVO alerting him that Contractor No. 2 would call P. IDROVO regarding ladder and fall protection safety training and a safety and health program and that P. IDROVO should use the name "Paul Mejia," when interacting with Contractor No. 2.

f. On or about January 18, 2020, P. IDROVO sent a text message to A. Idrovo stating that he had told Contractor No. 2 that he needed to pay \$4,000 in cash for the alleged safety training.

g. On or about January 20, 2020, P. IDROVO collected \$4,000 in cash from Contractor No. 2 in Newark, New Jersey, and furnished Contractor No. 2 with six computer-generated certificates which falsely represented that three workers of Contractor No. 2 had received OSHA certified ladder and fall protection safety training from "Paul Mejia," an alleged OSHA construction trainer, on January 19, 2020.

h. On or about March 10, 2020, after arriving at the work site of Contractor No. 3 in North Bergen, New Jersey, in response to an anonymous report alleging the misuse of an extension ladder, A. Idrovo falsely informed Contractor

No. 3 that the contractor needed to receive formal ladder safety training from “Jose Diaz” or face serious fines and possible arrest.

i. On or about the morning of March 19, 2020, A. Idrovo advised P. IDROVO by text message that Contractor No. 3 would be calling P. IDROVO regarding fall protection, ladder training and a health and safety program and that P. IDROVO should use the name “Jose Diaz.”

j. On or about the afternoon of March 19, 2020, P. IDROVO and A. Idrovo engaged in a discussion over text message regarding how much to charge.

k. During the same conversation referred to in paragraph 5j above, A. Idrovo stated that he had assured Contractor No. 3 that P. IDROVO was legitimate.

l. On or about March 23, 2020, P. IDROVO and A. Idrovo engaged in a discussion over text message during which P. IDROVO stated that A. Idrovo needed to tell Contractor No. 3 that the safety programs are necessary.

m. On or about April 15, 2020, A. Idrovo assured Contractor No. 3 in a consensually recorded telephone conversation in Bergen County, New Jersey that if Contractor No. 3 paid “Jose Diaz,” money for training certificates and then supplied the certificates to A. Idrovo that Contractor No. 3 would not have issues with OSHA.

n. On or about April 15, 2020, P. IDROVO advised Contractor No. 3 in a consensually recorded telephone conversation in Bergen County, New Jersey

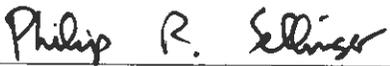
that the health and safety plan would operate as a “repellant” to get OSHA to stop bothering Contractor No. 3.

o. On or about April 22, 2020, P. IDROVO (i) collected \$6,000 in cash from Contractor No. 3 at a Dunkin parking lot in Kearny, New Jersey and (ii) gave Contractor No. 3 eight computer-generated certificates which falsely represented that four workers of Contractor No. 3 had received OSHA certified ladder and fall protection safety training from “Jose Diaz,” an alleged OSHA construction trainer, on March 12 and 13, 2020.

p. On or about April 24, 2020, A. Idrovo instructed Contractor No. 3 in a consensually recorded telephone conversation in Bergen County, New Jersey to send him the training certificates as soon as possible so that A. Idrovo could “put that in the system right away.”

q. On or about May 15, 2020, A. Idrovo submitted the fraudulent safety certificates on the OSHA system, along with A. Idrovo’s OSHA report on Contractor No. 3’s alleged OSHA violations, despite knowing that the alleged training was not provided and that alleged trainer “Jose Diaz,” was his brother P. IDROVO.

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

  
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PHILIP R. SELLINGER  
United States Attorney