

SN:RTP/VN
F. #2019R00504

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

GEORGE KALERGIOS,

Defendant.

----- X

I N F O R M A T I O N

Cr. No. 21-34 (PKC)
(T. 18, U.S.C., §§ 371, 666(a)(2),
981(a)(1)(C) and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

THE UNITED STATES ATTORNEY CHARGES:

At all times relevant to this Information, unless otherwise indicated:

INTRODUCTION

1. The defendant GEORGE KALERGIOS owned several businesses that operated in the New York City area, including Zeus Waste Management Inc. (“Zeus Waste Management”), a waste management carting business; Tres Construction, LLC (“Tres Construction”), a home building company; and EKB Services, Inc. (“EKB Services”), a multi-service contractor. KALERGIOS operated these businesses from various locations in Queens, New York.

2. Co-Conspirator 1, an individual whose identity is known to the United States Attorney, was employed by a college located in New York City (the “College”) as its Director of Facilities Management. Co-Conspirator 1 was responsible for all aspects of facilities management at the College, including day-to-day operations, maintenance and renovation projects. Co-Conspirator 1 was authorized by the College to enter into certain

contracts on the College's behalf, including contracts for the removal of non-hazardous waste.

Co-Conspirator 1 worked for the College in or about and between January 2018 and March 2019.

3. The College received more than \$10,000 in federal program funds each calendar year.

4. In or about July 2018, Co-Conspirator 1 awarded Zeus Waste Management a three-year contract (the "Contract") that granted Zeus Waste Management the exclusive right to remove non-hazardous waste from the College's New York City campus. Before the Contract was awarded, the defendant GEORGE KALERGIOS and Co-Conspirator 1 agreed that, in exchange for Co-Conspirator 1 awarding the Contract to Zeus Waste Management, KALERGIOS would pay Co-Conspirator 1 ten percent of the total amount paid under the Contract by the College to Zeus Waste Management and other companies owned by KALERGIOS.

5. Pursuant to this agreement, in or about and between June 2018 and March 2019, the defendant GEORGE KALERGIOS made multiple cash payments to Co-Conspirator 1 totaling approximately \$11,095.00, which represented ten percent of the amount that KALERGIOS's companies received from the College under the Contract.

6. In or about early 2019, the defendant GEORGE KALERGIOS and Co-Conspirator 1 discussed the possibility of KALERGIOS submitting a bid to secure another contract for services to be performed at the College. During these discussions, KALERGIOS and Co-Conspirator 1 agreed that KALERGIOS would pay Co-Conspirator 1 ten percent of the contract price if KALERGIOS were to be awarded the project.

COUNT ONE
(Bribery Conspiracy)

7. The allegations contained in paragraphs one through six are realleged and incorporated as if fully set forth in this paragraph.

8. In or about and between June 2018 and March 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant GEORGE KALERGIOS, together with others, did knowingly, willfully and corruptly conspire to give, offer and agree to give a thing of value to any person, with intent to influence and reward an agent of the College, an organization that received benefits in excess of \$10,000 under one or more Federal programs involving grants, contracts, subsidies, loans, guarantees, insurance and other forms of Federal assistance in one or more one-year periods, in connection with any business, transaction and series of transactions of the College involving \$5,000 or more, contrary to Title 18, United States Code, Section 666(a)(2).

9. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant GEORGE KALERGIOS, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about July 2, 2018, KALERGIOS and Co-Conspirator 1, acting on the College's behalf, entered in a contract that granted Zeus Waste Management the exclusive right to collect and dispose of all non-hazardous waste from the College's New York City Campus.

(b) On or about September 26, 2018, the College issued a payment in the amount of \$5,651.00 to Zeus Waste Management.

(c) On or about October 17, 2018, the College issued a payment in the amount of \$3,272.00 to Zeus Waste Management.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO
(Bribery)

10. The allegations contained in paragraphs one through six are realleged and incorporated as if fully set forth in this paragraph.

11. In or about and between June 2018 and March 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant GEORGE KALERGIOS, together with others, did knowingly and corruptly give, offer and agree to give a thing of value to any person, with intent to influence and reward an agent of the College, an organization that received benefits in excess of \$10,000 under one or more Federal programs involving grants, contracts, subsidies, loans, guarantees, insurance and other forms of Federal assistance in one or more one-year periods, in connection with any business, transaction and series of transactions of the College involving \$5,000 or more.

(Title 18, United States Code, Sections 666(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

12. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

13. 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), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))


SETH D. DUCHARME
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

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FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

GEORGE KALERGIOS,

Defendant.

INFORMATION

(T. 18, U.S.C., §§ 371, 666(a)(2), 981(a)(1)(C) and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreperson

Filed in open court this ----- *day,*

of ----- *A.D. 20* -----

Clerk

Bail, \$ -----

Robert Polemeni, Assistant U.S. Attorney (718) 254-6044