

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 15-  
 :  
 v. : 18 U.S.C. § 371  
 :  
 STANLEY PARZYCH :  
 : 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 STANLEY PARZYCH ("defendant PARZYCH") owned American Construction, a paving contracting company located in Jersey City, New Jersey.

B. The Union City, New Jersey Community Development Agency ("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.

C. There was an individual who was an inspector ("Inspector 1") at the UCCDA. Inspector 1 was an agent of a local government agency pursuant to 18 U.S.C. § 666(d)(1).

D. Joseph Lado ("Lado") owned Lado Construction, LLC ("Lado Construction"), a construction company located in Union City, New Jersey. Defendant PARZYCH engaged in collusion with Lado with regard to sidewalk replacement projects through the UCCDA.

E. Through agreements to rehabilitate residential properties that Lado and Lado Construction entered into with the UCCDA, 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).

#### The Conspiracy

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

STANLEY PARZYCH

did knowingly and intentionally conspire and agree with others, including Lado and Inspector 1, to obtain by fraud, and otherwise without authority knowingly convert to the use of others, and

intentionally misapply, funds owned by and under the care, custody and control of the UCCDA, with a value of more than \$30,000, contrary to Title 18, United States Code, Section 666(a)(1)(A).

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

4. It was part of the conspiracy that:

A. Between in or about June 2007 and in or about November 2010, defendant PARZYCH (i) on many occasions provided Lado with phony proposals from American Construction that were higher than Lado's proposals and (ii) on other occasions, provided Lado with blank proposal forms from American Construction that Lado later completed or caused to be completed, listing amounts that were higher than Lado Construction's proposals for the same work. Under both of these scenarios, Lado then would submit American Construction's phony proposals and Lado's own proposals 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 American Construction proposal forms in amounts higher than those of American

Construction's competitors in order to secure HUD-funded sidewalk replacement and residential improvement projects for certain contractors, including Lado Construction, from the UCCDA.

Overt Acts

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

A. On or about July 10, 2010, defendant PARZYCH completed a phony proposal in the amount of \$5,300 for a sidewalk replacement project located on 39<sup>th</sup> Street in Union City.

B. On or about July 14, 2010, defendant PARZYCH completed a phony proposal in the amount of \$5,900 for a sidewalk replacement project located on 22<sup>nd</sup> Street in Union City.

C. On or about July 14, 2010, defendant PARZYCH completed 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  
UNITED STATES ATTORNEY

CASE NUMBER: 15-

---

---

**United States District Court  
District of New Jersey**

---

---

**UNITED STATES OF AMERICA**

**v.**

**STANLEY PARZYCH**

---

---

**INFORMATION FOR**

Title 18, United States Code, Section 371

---

---

**PAUL J. FISHMAN**

*UNITED STATES ATTORNEY, NEWARK, NEW JERSEY*

---

---

BARBARA R. LLANES  
ASSISTANT U.S. ATTORNEY  
NEWARK, NEW JERSEY  
(973) 297-2051

---

---