FEB 17 2022 [illegible]

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

Grand Jury H-21-1

UNITED STATES OF AMERICA	Criminal No. 3:22CR 33 OAW / RMS
v.	VIOLATIONS: 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud)
MICHAEL DIMASSA, JOHN TRASACCO, LAUREN KNOX, and JOHN BERNARDO	18 U.S.C. § 1343 (Wire Fraud) 18 U.S.C. § 2 (Aiding and Abetting)

INDICTMENT

The Grand Jury charges:

COUNT ONE
The JIL Sanitation and L & H Company Conspiracy
(DIMASSA and TRASACCO)
(Conspiracy to Commit Wire Fraud)

Background

1. At all times relevant to this Indictment, defendant MICHAEL DIMASSA ("DIMASSA") was employed by the City of West Haven, Connecticut. DIMASSA was employed by West Haven for approximately twelve years in various positions, including as an Administrative Assistant to the West Haven City Council, Clerk of the West Haven City Council, Assistant to the West Haven Mayor, and Assistant to the West Haven Registrar of Voters.

2. In or about April 2020, the State of Connecticut was allocated money by the U.S. Department of the Treasury through the Coronavirus Relief Fund (CRF), which was established by the CARES Act (Public Law 116-136) for the purpose of helping local governments pay costs

incurred in responding to the COVID-19 pandemic. For the period of July 1, 2020, through September 30, 2021, the City of West Haven received approximately $1,150,257 in financial assistance from this fund.

3. On or about December 28, 2020, as part of his employment with the City of West Haven, DIMASSA was authorized to approve the designated relief funds for the reimbursement of COVID-related expenditures incurred by West Haven.

4. At all times relevant to this Indictment, defendant JOHN TRASACCO ("TRASACCO") was a resident of West Haven, Connecticut.

5. L & H Company, LLC was formed on March 20, 2019. TRASACCO was the organizer of L&H Company and the business listed an address in Beverly Hills, California.

6. On or about March 27, 2019, a bank account for L & H Company was established with an address in Beverly Hills, California. TRASACCO was listed as the authorized signatory.

7. JIL Sanitation Solutions, LLC was formed June 24, 2021. TRASACCO was the sole principal in JIL Sanitation Solutions. The business address was TRASACCO's home in Connecticut.

8. On July 12, 2021, a bank account for JIL Sanitation Solutions was established and listed an address in Branford, Connecticut. TRASACCO was listed as the authorized signatory.

<u>The Conspiracy</u>

9. From in or about January 2021 until in or about November 2021, in the District of Connecticut and elsewhere, DIMASSA and TRASACCO, knowingly and with the intent to defraud, conspired, combined, confederated, and agreed with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, that is, to devise a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses,

representations, and promises, and in furtherance of that scheme and conspiracy to use and cause the use of interstate wire communications. As set forth below with more particularity, the scheme and conspiracy involved defendants DIMASSA and TRASACCO defrauding the City of West Haven by taking money designated for the benefit of the citizens of West Haven for their own use by billing West Haven for COVID-related services that were never provided.

Manner and Means of the Conspiracy

10. As part of the scheme, invoices were prepared that fraudulently described services allegedly provided by L & H Company or JIL Sanitation Services.

11. As part of the scheme, DIMASSA caused the City of West Haven to issue payments for the fraudulent invoices in the form of a check, to either L & H Company or JIL Sanitation Services. Both of these entities were controlled by TRASACCO.

12. As part of the scheme, DIMASSA included charges for goods and services never received by West Haven, including thousands of units of Personal Protective Equipment (PPE), HVAC maintenance at multiple municipal locations, COVID supplies for the Board of Education, and cleaning services for various municipal and school buildings. One listed item was a charge for cleaning a school building that had been vacant and abandoned for several years.

13. As part of the scheme, these fraudulent invoices caused the City of West Haven to issue five checks totaling approximately $431,982 to the entities controlled by TRASACCO.

14. As part of the scheme, TRASACCO negotiated the checks procured by DIMASSA, causing the transmission interstate wires, and then used the money for his own benefit.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
(DIMASSA and TRASACCO)
(Wire Fraud)

15. Paragraphs 1 through 14 are incorporated by reference.

16. On or about February 12, 2021, for the purpose of executing the scheme and artifice described in Count One, defendants DIMASSA and TRASACCO knowingly caused the interstate wire transmission of certain writings, signs, signals, pictures, and sounds, that is, an interstate wire transmission caused by the negotiation by TRASACCO of Check Number xxxxx7003 issued by the City of West Haven and made payable to L & H Company in the amount of $68,728.00.

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT THREE:
The Youth Violence Prevention Grants Conspiracy
(DIMASSA and KNOX)
(Conspiracy to Commit Wire Fraud)

17. Paragraphs 1 through 3 are incorporated by reference.

18. At all times relevant to this Indictment, defendant LAUREN KNOX ("KNOX") was a resident of West Haven, Connecticut.

The Conspiracy

19. From in or about July 2020 until in or about October 2021, in the District of Connecticut and elsewhere, DIMASSSA and KNOX, knowingly and with the intent to defraud, conspired, combined, confederated, and agreed with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, that is, to devise a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and in furtherance of that scheme and conspiracy to use and cause the use of interstate wire communications. As set forth below with more particularity, the scheme and conspiracy involved defendants DIMASSA and KNOX defrauding the City of West Haven

by taking money designated for the benefit of the citizens of West Haven for their own use by fraudulently submitting bills for a youth violence grant program.

Manner and Means of the Conspiracy

20. As part of the scheme, defendants DIMASSA and KNOX submitted multiple requests for payment from the City of West Haven for services related to a Youth Violence Prevention Program and for Youth Violence COVID-19 Associated Expenses. These invoices listed charges for in-home counseling, cleaning supplies, special needs hourly service, wi-fi assistance for low/moderate income families, counseling services, license fees, a fall youth clinic, meals, support group supplies, equipment rental, and youth clinic support group.

21. As part of the scheme, the payment vouchers requested that checks be made out to KNOX.

22. As part of the scheme, when KNOX received a check from the City of West Haven, she would cash the check and then deposit a portion of the proceeds into her personal bank account. On one occasion, KNOX deposited the entire proceeds from a check into her personal bank account for her personal use.

23. During the period charged in this Indictment, the City of West Haven issued sixteen checks totaling approximately $147,776.10 to KNOX. During this period of time, KNOX never provided any services to the City of West Haven.

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

COUNT FOUR
(DIMASSA and KNOX)
(Wire Fraud)

24. Paragraphs 1 through 3 and 18 through 23 are incorporated by reference.

25. On or about August 23, 2021, for the purpose of executing the scheme and artifice

described in Count Three above, defendants DIMASSA and KNOX knowingly caused the interstate wire transmission of certain writings, signs, signals, pictures, and sounds, that is, an interstate wire transmission caused by the negotiation of Check Number xxxxx1738 issued by the City of West Haven in the amount of $8,433.25 to KNOX and the subsequent deposit of the proceeds into KNOX's personal bank account.

In violation of Title 18, United States Code, Section 1343.

COUNT FIVE
The Compass Investments Conspiracy
(DIMASSA and BERNARDO)
(Conspiracy to Commit Wire Fraud)

26. Paragraphs 1 through 3 are incorporated by reference.

27. At all times relevant to this Indictment, JOHN BERNARDO ("BERNARDO") was a resident of West Haven, Connecticut.

The Conspiracy

28. From in or about January 2021 until in or about October 2021, in the District of Connecticut and elsewhere, DIMASSSA and BERNARDO, knowingly and with the intent to defraud, conspired, combined, confederated, and agreed with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, that is, to devise a scheme and artifice to defraud and obtain money by means of materially false and fraudulent pretenses, representations, and promises, and in furtherance of that scheme and conspiracy to use and cause the use of interstate wire communications. As set forth below with more particularity, the scheme involved defendants DIMASSA and BERNARDO defrauding the City of West Haven by taking money designated for the benefit of the citizens of West Haven for their own use by submitting false payment vouchers for COVID services never received by West Haven.

Manner and Means of the Conspiracy

29. As part of the scheme, Compass Investment Group, LLC was formed on January 27, 2021. The business had two principals, DIMASSA and BERNARDO. The listed business address was the home address of BERNARDO.

30. As part of the scheme, on February 5, 2021, a bank account for Compass Investment Group was established at a bank in Connecticut. The listed address was BERNARDO's home address. Both DIMASSA and BERNARDO were listed as authorized signatories.

31. As part of the scheme, DIMASSA submitted requests for payment to the City of West Haven for services provided by Compass Investment Group, when no such services were provided. The requests listed alleged services such as COVID-19 Legal + Lobbying + Site work for COVID-19 Clinic, Consulting Service-Legislative Review Executive Orders – COVID-19, Consulting Service-Support Staff Services, Monitors/Security Site (April 2021-May 2021), and Consulting Service Lobbying Service – COVID-19 Federal.

32. These requests for payment caused the City of West Haven to issue checks to Compass Investment Group. In total, the City of West Haven issued thirteen checks totaling approximately $636,783.70 to Compass Investment Group even though it received none of the services described on the invoices.

All in violation of Title 18, United States Code, Section 1349.

COUNT SIX
(DIMASSA and BERNARDO)
(Wire Fraud, Aiding and Abetting)

33. Paragraphs 1 through 3 and 27 through 32 are incorporated by reference.

34. On or about May 7, 2021, for the purpose of executing the scheme and artifice described in Count Five, defendants DIMASSA and BERNARDO knowingly caused the interstate

wire transmission of certain writings, signs, signals, pictures, and sounds, that is, an interstate wire transmission caused by the deposit of Check Number xxxxx9061 issued by the City of West Haven to Compass Investment Group in the amount of $85,595.00.

All in violation of Title 18, United States Code, Sections 1343.

A TRUE BILL

/s/

FOREPERSON

UNITED STATES OF AMERICA

LEONARD C BOYLE
UNITED STATES ATTORNEY

RAY MILLER
ASSISTANT UNITED STATES ATTORNEY