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JJD:CMM  
F. #2015R02148

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No. **CR 16 540**  
(T. 18, U.S.C., §§ 371, 666(a)(1)(B),  
981(a)(1)(C), 982(a)(2)(A), 1001(a)(2),  
1343, 1346, 1349, 1512(c)(2), 1512(k),  
1951(a), 2 and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

EDWARD MANGANO,  
LINDA MANGANO and  
JOHN VENDITTO,

Defendants.

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AZRACK, J.

THE GRAND JURY CHARGES:

BROWN, M. J.

INTRODUCTION TO ALL COUNTS

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

Nassau County and the Town of Oyster Bay

1. Nassau County was a county in the State of New York. Nassau County had approximately 1.3 million residents and was comprised of two cities, three towns, 64 villages, and more than 60 hamlets. Nassau County awarded contracts to provide services to the public. In or about and between 2010 and the present, Nassau County received in excess of \$10,000 each calendar year under federal programs involving grants and other forms of federal assistance.

2. One of the three towns in Nassau County was the Town of Oyster Bay (the "TOB"). The TOB was comprised of 18 villages and 18 hamlets, all of which were located in Nassau County. The Town Board was the legislative authority for the TOB. The

TOB awarded contracts to provide services to the public. In or about and between 2010 and the present, the TOB received in excess of \$10,000 each calendar year under federal programs involving grants and other forms of federal assistance.

The Defendants and Co-Conspirator #1

3. Since January 2010, the defendant EDWARD MANGANO has served as the Nassau County Executive. EDWARD MANGANO, the highest ranking elected official in Nassau County, acted as both the chief executive and fiscal officer of Nassau County.

4. The defendant LINDA MANGANO was the wife of the defendant EDWARD MANGANO. Between April 2010 and August 2014, LINDA MANGANO was paid more than \$450,000 for performing little or no work by a local businessman and restaurateur, an individual whose identity is known to the Grand Jury ("Co-Conspirator #1").

5. Since January 1998, the defendant JOHN VENDITTO has served as the TOB Supervisor. VENDITTO, the highest ranking elected official in the TOB, acted as both the chief executive and fiscal officer of the Town. As Supervisor, VENDITTO was a member of the TOB Town Board, presided over Town Board meetings, and voted on matters before the Town Board.

6. Co-Conspirator #1 owned and operated approximately 30 businesses, located primarily in Nassau County. One of the businesses was a restaurant located in Hicksville, New York ("Restaurant #1"). Another of the Co-Conspirator #1 business entities was a restaurant located in Queens, New York ("Restaurant #2").

7. Some of Co-Conspirator #1's business entities were awarded contracts by Nassau County and the TOB, including, but not limited to, contracts to provide food services to certain Nassau County agencies and concession agreements to operate various food concessions within the TOB.

### The Defendants' Criminal Schemes

#### I. Solicitation and Receipt of Bribes in Exchange for Official Action

8. In or about and between January 2010 and February 2015, the defendants EDWARD MANGANO and JOHN VENDITTO, together with others, engaged in a scheme to solicit and receive bribes and kickbacks from Co-Conspirator #1 in exchange for EDWARD MANGANO and JOHN VENDITTO performing official actions, on an as-needed basis, as opportunities arose, in connection with Co-Conspirator #1's businesses in Nassau County and the TOB, including, but not limited to: (a) the TOB's guarantee of certain loans that certain business entities of Co-Conspirator #1 received from a bank, the identity of which is known to the Grand Jury (the "Bank"), and a private financing company, the identity of which is known to the Grand Jury (the "Lender"), in connection with Co-Conspirator #1's status as a TOB concessionaire (the "TOB Loan Scheme"); and (b) Nassau County's award of certain contracts to certain business entities of Co-Conspirator #1 (the "Nassau County Contracts Scheme").

9. With respect to the TOB Loan Scheme, Co-Conspirator #1, through a business entity ("Restaurant #3"), had a concession agreement with the TOB to operate a restaurant and catering facility on property owned by the TOB. In addition, Co-Conspirator #1, through another business entity ("Restaurant #4"), had a concession