



# NEWS RELEASE

OFFICE OF THE UNITED STATES ATTORNEY  
WESTERN DISTRICT OF MISSOURI

**TODD P. GRAVES**

---

Contact Don Ledford, Public Affairs • (816) 426-4220 • 400 East Ninth Street, Room 5510 • Kansas City, MO 64106

[www.usdoj.gov/usao/mow](http://www.usdoj.gov/usao/mow)

---

**NOVEMBER 4, 2003**  
**FOR IMMEDIATE RELEASE**

## **FIVE INDICTED FOR BRIBERY IN ROCKHURST CONTRACTS, LABOR RACKETEERING**

**KANSAS CITY, Mo.** – Todd P. Graves, United States Attorney for the Western District of Missouri, announced that five defendants – including several members of a Kansas City-North family, a Gladstone CPA and a Lee’s Summit business owner – were indicted by a federal grand jury today for bribing a former director of physical plant at Rockhurst University in order to receive nearly \$1 million in contracts for demolition and asbestos removal, as well as charges of labor racketeering.

**Charles A. Cacioppo, Jr.**, 51, of Kansas City, Mo.; **Richard Don Plaskett, Jr.**, 46, of Lee’s Summit, Mo.; **Anthony D. Conforti**, 37, of Gladstone, Mo.; **Charles A. Cacioppo III**, 24, of Kansas City, Mo.; and **Anna Cacioppo**, 25, of Kansas City, Mo. were charged in a 39-count indictment returned by a federal grand jury in Kansas City. **Cacioppo, Jr.**, is the father of **Cacioppo III** and **Anna Cacioppo**.

### **BRIBERY CONSPIRACY**

Twenty-three counts of the federal indictment are related to a bribery conspiracy that involved contracts awarded by Rockhurst University to Industrial Salvage and Wrecking, Inc. (ISW), which is owned by **Cacioppo, Jr.**, and to Industrial Environmental Management, Inc. (IEM), which is co-owned by **Cacioppo, Jr.**, and **Plaskett**. Today’s indictment alleges that **Cacioppo, Jr.**, **Plaskett**, **Conforti** and **Cacioppo III** participated in a conspiracy to commit bribery and mail fraud to defraud Rockhurst University.

According to the indictment, ISW and IEM would submit invoices to Rockhurst charging more than the value of the work performed and charging Rockhurst for projects that were never performed. **Cacioppo, Jr.**, and **Plaskett** allegedly bribed Ralph Dunn, the school’s former physical plant director, in order to receive various demolition and asbestos abatement projects. Dunn pleaded guilty on Sept. 24, 2003, to defrauding Rockhurst by taking more than \$100,000 in

bribes as part of a kickback scheme, and to filing a false tax return. **Conforti**, a Certified Public Accountant who performed professional services for ISW and IEM, allegedly advised his co-conspirators how to structure the financial transactions in the bribe payments to avoid detection. **Cacioppo III** allegedly conducted financial transactions which assisted in the payments of the bribes to Dunn.

From May 1998 to June 2001, ISW received \$697,215 in payments from Rockhurst. During this time, ISW paid approximately \$102,600 in bribes to Dunn. From June 1999 to June 2001, IEM received \$232,969 in payments from Rockhurst. During this time, IEM paid approximately \$21,200 in bribes to Dunn.

Counts Two and Three of the federal indictment are mail fraud charges. This mail fraud, the indictment alleges, was part of the bribery scheme to defraud Rockhurst. Count Two alleges that **Cacioppo, Jr.**, caused a letter to be mailed from ISW to Rockhurst University, concerning the demolition of a building located at 1100 Rockhurst Road, Kansas City, Mo. Count Three alleges that **Cacioppo, Jr.**, mailed a \$2,000 cashier's check to Dunn as the final payment in the fraud scheme.

The indictment charges 20 separate bribes paid to Dunn in the course of the conspiracy, ranging from \$1,500 to \$12,000, between Aug. 24, 1998, and June 12, 2001. Those bribes were allegedly for demolition and other work done at several properties owned by Rockhurst, as well as work done at Xavier and Loyola dormitories, at Masseman Hall and Cochran Hall, and a football field between 53<sup>rd</sup> and 54<sup>th</sup> Streets in Kansas City, Mo.

Counts Four through Eight of the federal indictment allege five separate instances in which **Cacioppo, Jr.**, paid bribes to Dunn.

Counts Nine through Twelve of the federal indictment allege four separate instances in which **Cacioppo, Jr.**, aided and abetted by **Plaskett**, paid bribes to Dunn.

Count Thirteen of the federal indictment alleges one instance in which **Cacioppo, Jr.**, aided and abetted by **Plaskett** and **Cacioppo III**, paid bribes to Dunn.

Counts Fourteen through Twenty of the federal indictment alleges seven separate instances in which **Cacioppo, Jr.**, aided and abetted by **Conforti**, paid bribes to Dunn.

Counts Twenty-One through Twenty-Three of the federal indictment alleges three instances in which **Cacioppo, Jr.**, aided and abetted by **Conforti** and **Cacioppo III**, paid bribes to Dunn.

## **LABOR RACKETEERING**

The remaining counts of the federal indictment involve charges of labor racketeering involving two labor organizations whose members were employed by IEM. The indictment alleges that IEM deliberately underpaid its contributions to employee benefit plans by falsifying

paperwork and under-counting the number of employees and the hours they worked.

According to the indictment, IEM was a party to a collective bargaining agreement with Local 264, Laborers International Union of North America, which required the firm to contribute to employee benefit plans – the Laborers Fringe Benefits Office Health and Welfare Trust and the Laborers Fringe Benefit Pension Fund – a specified sum of money based on the number of hours worked by each employee covered by the terms of the agreement. IEM was required to submit a Kansas City Area Laborer Fringe Benefits Monthly Remittance Report on which to report the names of all its eligible employees and the hours they worked, and to set forth the amount of IEM's contribution to the Laborer's Welfare Fund and the Laborers Pension Fund.

Counts Twenty-Four through Twenty-Seven of the federal indictment allege that **Plaskett** made false statements and representations of fact in the Remittance Reports submitted by IEM for the four months of April, May, October and November 1999. The indictment alleges that **Plaskett** did not correctly report all of the employees of IEM who were eligible for contributions to be made on their behalf and the hours for which such employees were eligible for contributions.

Counts Twenty-Eight through Thirty-Two of the federal indictment allege that IEM office manager **Anna Cacioppo**, aided and abetted by **Plaskett** and **Cacioppo, Jr.**, made false statements and representations of fact in the Remittance Reports submitted by IEM for the five months of February, March, May, June and November 2001. The indictment alleges that **Anna Cacioppo** did not correctly report all of the employees of IEM who were eligible for contributions to be made on their behalf and the hours for which such employees were eligible for contributions.

According to the indictment, IEM was a party to a collective bargaining agreement with Local 1290, Laborers International Union of North America, which required the firm to contribute to employee benefit plans – the Kansas Building Trades Open End Health and Welfare Trust Fund and the Kansas Building Trades Pension Fund – a specified sum of money based on the number of hours worked by each employee covered by the terms of the agreement. IEM was required to submit an Employer's Detail Contribution Report and an Employer's Summary Contribution Report on which to report the names of all its eligible employees and the hours they worked, and to set forth the amount of fringe benefits owed by IEM to the Kansas Welfare Fund and the Kansas Pension Fund.

Counts Thirty-Three through Thirty-Eight of the federal indictment allege that **Anna Cacioppo** made false statements and representations of fact in the Employer's Detail Contribution Report submitted by IEM for the months of June through November, 2002. The indictment alleges that **Anna Cacioppo** did not correctly report all of the employees of IEM who were eligible for contributions to be made on their behalf and the hours for which such employees were eligible for contributions.

Count Thirty-Nine of the federal indictment is a mail fraud charge, alleging that on Dec. 12, 2002, **Anna Cacioppo** mailed Employer Detail Contribution Reports and Employer

Summary Contribution Reports, which falsely stated the amount of contributions owed to the Kansas Welfare Fund and the Kansas Pension Fund, as part of the labor racketeering alleged in the indictment.

Graves cautioned that the charges contained in the indictment are simply accusations, and not evidence of guilt. Evidence supporting the charges must be presented to a federal trial jury, whose duty is to determine guilt or innocence.

The case is being prosecuted by Assistant U.S. Attorneys Paul S. Becker and Bruce E. Clark. It was investigated by the Federal Bureau of Investigation, the Department of Labor – Office of Labor Racketeering, the Internal Revenue Service – Criminal Investigation, and the Defense Contract Investigative Service.

\*\*\*\*\*

This news release, as well as additional information about the office of the United States Attorney for the Western District of Missouri, is available on-line at

[www.usdoj.gov/usao/mow](http://www.usdoj.gov/usao/mow)