

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. José R. Almonte
	:	
v.	:	Mag. No. 26-16211 (JRA)
	:	
ALFONSO A. ZAMARRA	:	CRIMINAL COMPLAINT

I, Joseph Patricola, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

s/ Joseph Patricola

Task Force Officer Joseph Patricola
Federal Bureau of Investigation

Task Force Officer Patricola attested to
this Complaint by telephone pursuant to
FRCP 4.1(b)(2)(A).

Sworn to and subscribed via telephone,
this 20th day of October, 2026

DISTRICT OF NEW JERSEY
County and State

HONORABLE JOSÉ R. ALMONTE
UNITED STATES MAGISTRATE JUDGE

s/ Hon. José R. Almonte, U.S.M.J.

Signature of Judicial Officer

ATTACHMENT A

Counts 1 to 26

Wire Fraud

On or about the dates listed below, in the District of New Jersey, and elsewhere, the defendant,

ALFONSO A. ZAMARRA,

did knowingly and intentionally devise a scheme and artifice to defraud Hudson County, and to obtain money and property from Hudson County by means of materially false and fraudulent pretenses, representations, and promises, and, for purposes of executing such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, namely the wires transmissions set forth below and as further described in Attachment B, each constituting a separate count of this Complaint:

Count	Date (Approx.)	Interstate Wire Transmission
1	November 19, 2021	Direct deposit of \$977.55
2	December 17, 2021	Direct deposit of \$977.54
3	December 30, 2021	Direct deposit of \$977.55
4	January 14, 2022	Direct deposit of \$985.16
5	January 28, 2022	Direct deposit of \$985.19
6	February 11, 2022	Direct deposit of \$985.15
7	February 25, 2022	Direct deposit of \$985.17
8	March 11, 2022	Direct deposit of \$985.16
9	March 25, 2022	Direct deposit of \$985.18
10	April 8, 2022	Direct deposit of \$985.15
11	April 22, 2022	Direct deposit of \$985.17
12	May 6, 2022	Direct deposit of \$985.16
13	April 21, 2023	Direct deposit of \$1,015.36
14	May 5, 2023	Direct deposit of \$1,015.36
15	July 28, 2023	Direct deposit of \$1,015.36
16	August 11, 2023	Direct deposit of \$1,015.38
17	August 25, 2023	Direct deposit of \$1,015.36
18	September 8, 2023	Direct deposit of \$1,015.36
19	October 6, 2023	Direct deposit of \$1,015.37
20	October 20, 2023	Direct deposit of \$1,015.37
21	December 3, 2021	Direct deposit of \$977.55
22	May 19, 2023	Direct deposit of \$1,015.37
23	June 2, 2023	Direct deposit of \$1,015.36

24	June 15, 2023	Direct deposit of \$1,015.35
25	June 30, 2023	Direct deposit of \$1,015.36
26	July 14, 2023	Direct deposit of \$1,015.36

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

Counts 27 to 28

Wire Fraud

On or about the dates listed below, in the District of New Jersey, and elsewhere, the defendant,

ALFONSO A. ZAMARRA,

did knowingly and intentionally devise a scheme and artifice to defraud the State of New Jersey, and to obtain money and property from the State of New Jersey by means of materially false and fraudulent pretenses, representations, and promises, and, for purposes of executing such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, namely the wire transmissions set for the below and as further described in Attachment B, each constituting a separate count of this Complaint:

Count	Date (Approx.)	Interstate Wire Transmission
27	May 29, 2022	Electronic submission of claim for unemployment benefits
28	November 26, 2023	Electronic submission of claim for unemployment benefits

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

ATTACHMENT B

I, Joseph Patricola, a Task Force Officer with the Federal Bureau of Investigation (“FBI”), having personally participated in an investigation of the conduct of defendant Alfonso A. Zamarra (“ZAMARRA”) and others, having reviewed, among other materials, law enforcement records and databases, telephone records, surveillance photographs, electronic communications, and bank records, and having spoken with other law enforcement officers and individuals, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the statements and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged. Dollar amounts, and other figures cited herein, are approximations.

RELEVANT INDIVIDUALS AND ENTITIES

1. At all times relevant to this Criminal Complaint:
 - a. ZAMARRA was a resident of Bergen County, New Jersey. ZAMARRA used a cellular phone that is referred to herein as the “Zamarra Phone.”
 - b. ZAMARRA was the President of Apex Apparel Services, Inc. (“Apex”), a C-corporation registered in New Jersey.
 - c. Individual-1 was a high-ranking official within the Hudson County, New Jersey Parks Department (the “Parks Department”) and a longtime personal associate of ZAMARRA.
 - d. The Parks Department was responsible for the maintenance and operation of all parkland in Hudson County, New Jersey, including but not limited to providing seasonal maintenance, coordinating the scheduling of recreational events, and site development, renovations, and drainage improvements.
 - e. The Parks Department employed both permanent and seasonal employees. Seasonal employees were prohibited from working more than six months during any 12-month period. Seasonal employees’ duties included, among other things, cleaning and maintenance of the parks and fields in Hudson County. Seasonal employees were required to work on-site; no teleworking was allowed.
 - f. Parks Department seasonal employees were required to fill out and sign bi-weekly attendance sheets that itemized the hours worked during each pay period. The following language was included at the top of each form:

This record reflects the time that you initially arrive and finally depart from work each day. It also reflects the time you leave for lunch and return from lunch. You must accurately reflect those times. All employees are required to record their hours of work. No employee is to record the time of another employee. Any exceptions to your normal hours of work and lunch period should be explained in the Exceptions Column. Such exceptions include absences, late arrival, early departure, or variation from the normal lunch period. Employees who do not work a full day or who take a longer lunch period are subject to being docked for the time not worked. Chronic or excessive absenteeism or lateness is a violation of County policy. Employees who violate these rules are subject to discipline.

g. Parks Department seasonal employees were given the option of providing their checking account information to Hudson County so that their compensation could be wired directly to their bank accounts.

h. The Coronavirus Aid, Relief, and Economic Security (“CARES Act”) was signed into law in March 2020. Through the CARES Act, Unemployment Insurance (“UI”) claims were eligible to receive additional monies and benefit weeks from temporary federal programs: Federal Pandemic Unemployment Compensation (“FPUC”); Loss Wage Assistance-FEMA (“LWA”); Extended Benefits (“EB”); and Pandemic Emergency Unemployment Compensation “PEUC”). New Jersey Department of Labor (“NJDOL”) was the administrator of all of the CARES Act unemployment programs in New Jersey.

i. Individuals eligible to receive unemployment insurance funded by the CARES Act could apply for benefits through NJDOL’s online portal.

j. NJDOL provided unemployment insurance benefits to individuals determined by NJDOL to be entitled to receive such benefits through bank deposits, which were funded by NJDOL and sent from NJDOL’s account managed by Bank of America.

k. NJDOL’s determination of whether individuals were entitled to receive unemployment insurance benefits relied on an initial application by the applicant submitted on its online portal. Once that application was verified, the beneficiary had to complete weekly certifications that the beneficiary was unemployed throughout the prior one-week period.

l. Once the weekly certification was completed, NJDOL funded that claim by having funds drawn from the United States federal treasury in Washington, D.C. wired to a financial institution, which then wired those payments to the applicant’s bank account.

ZAMARRA'S EMPLOYMENT WITH HUDSON COUNTY

2. In or about December 2019, ZAMARRA applied for a position as a Parks Department seasonal employee. Individual-1 was listed as a reference.

3. Soon after, ZAMARRA was hired by the Parks Department as a seasonal employee. His official title was "Seasonal Assistant" and his New Hire and Intergovernmental Transfer Form was signed by Individual-1. ZAMARRA was employed as a Seasonal Assistant from on or about December 16, 2019 through on or about July 18, 2020.

4. ZAMARRA was rehired by the Parks Department in or about October 2021. Prior to his rehiring, on or about September 8, 2021, a Hudson County employee emailed Individual-1 and other Hudson County employees to inquire as to the quality of ZAMARRA's work during his first purported term as a seasonal employee. In the email, titled, "Re: ALFONSO ZAMARRA SEASONAL REHIRE," the sender wrote, "how was Mr. Zamarra's attendance and work performance? If all is well, please move forward." Individual-1 responded, "My referral has to be good I wouldn't have anything less." Though the sender wrote back, "I am sure your referral is good, my questions are very simple, lol," it does not appear that there were any additional responses.

5. ZAMARRA was then rehired. His second term as a seasonal employee for Hudson County ran from on or about October 23, 2021 through on or about April 23, 2022.

6. ZAMARRA was rehired for a third term as a Parks Department seasonal employee in or about March 2023. His third term as a seasonal employee ran from on or about March 27, 2023 through September 9, 2023.

7. In total, during ZAMARRA's three periods of purported employment, which spanned approximately 49 pay periods, Hudson County paid ZAMARRA approximately \$45,327.45 in wages for work he purportedly performed as a seasonal employee. These wages were directly deposited to his bank account (the "Zamarra Account"), including on the approximate dates listed below:¹

¹ I have confirmed that each of these electronic transactions were conducted through use of servers located in multiple states and internationally.

<u>Date</u>	<u>Approximate Amount of Deposit</u>	<u>Associated Count</u>
November 19, 2021	\$977.55	1
December 17, 2021	\$977.54	2
December 30, 2021	\$977.55	3
January 14, 2022	\$985.16	4
January 28, 2022	\$985.19	5
February 11, 2022	\$985.15	6
February 25, 2022	\$985.17	7
March 11, 2022	\$985.16	8
March 25, 2022	\$985.18	9
April 8, 2022	\$985.15	10
April 22, 2022	\$985.17	11
May 6, 2022	\$985.16	12
April 21, 2023	\$1,015.36	13
May 5, 2023	\$1,015.36	14
July 28, 2023	\$1,015.36	15
August 11, 2023	\$1,015.38	16
August 25, 2023	\$1,015.36	17
September 8, 2023	\$1,015.36	18
October 6, 2023	\$1,015.37	19
October 20, 2023	\$1,015.37	20
December 3, 2021	\$977.55	21

May 19, 2023	\$1,015.37	22
June 2, 2023	\$1,015.36	23
June 15, 2023	\$1,015.35	24
June 30, 2023	\$1,015.36	25
July 14, 2023	\$1,015.36	26

ZAMARRA’S SCHEME TO DEFRAUD HUDSON COUNTY

8. The investigation has revealed that, while bi-weekly attendance sheets, purportedly signed by ZAMARRA and his supervisor, were submitted to Hudson County, which resulted in Hudson County directly depositing wages into ZAMARRA’s bank account through wire transfers, ZAMARRA did not actually work as a seasonal employee for Hudson County.

9. First, location data for the Zamarra Phone revealed that ZAMARRA was rarely in Hudson County during the time periods that he purportedly worked as a seasonal employee for the Parks Department. Four such examples are included in the chart below:

<u>Date</u>	<u>Hours Purportedly Worked</u>	<u>Approximately Location of Zamarra Phone²</u>
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² The information in this column includes the approximate time that the Zamarra Phone communicated with a cellular phone tower and the approximate location of that cellular phone tower. Based on my training and experience, I know that providers of cellular telephone service have technical capabilities that allow them to collect and generate information about the locations of the cellular telephones to which they provide service, including cell-site data, also known as “tower/face information” or “cell tower/sector records.” Cell-site data identifies the “cell towers” (i.e., antenna towers covering specific geographic areas) that received a radio signal from the cellular telephone and, in some cases, the “sector” (i.e., faces of the towers) to which the telephone connected. These towers are often a half-mile or more apart, even in urban areas, and can be 10 or more miles apart in rural areas. Furthermore, the tower closest to a wireless device does not necessarily serve every call made to or from that device. Accordingly, cell-site data provides an approximate location of the cellular telephone.

November 5, 2021	4:00 p.m. to 10:00 p.m.	4:43 p.m.: Rutherford ³ , New Jersey 7:30 p.m.: Rutherford, New Jersey
April 2, 2023	8:00 a.m. to 10:00 p.m.	9:41 a.m.: Rutherford, New Jersey 1:44 p.m.: Rutherford, New Jersey 5:39 p.m.: Rutherford, New Jersey
June 23, 2023	3:00 p.m. to 10:00 p.m.	6:52 p.m. through 9:23 p.m.: Worcester, Massachusetts
June 24, 2023	8:00 a.m. to 10:00 p.m.	2:19 p.m. through 8:12 p.m.: Worcester, Massachusetts

10. Second, while ZAMARRA purportedly signed attendance sheets attesting that he had worked the following hours during the time periods listed below, a review of United Airlines records, obtained pursuant to grand jury subpoena, revealed that ZAMARRA was actually in Naples, Italy during portions of those reported dates and times, and thus could not have actually performed his duties for the Parks Department:

³ Rutherford, New Jersey is located in Bergen County.

Attendance Sheet Time Frame	Number of Hours Purportedly Worked	United Airlines Flight Information
June 17, 2023 through June 30, 2023	70 hours: - June 17 and June 18: 8 a.m. through 10:00 p.m. each day - June 23 through June 25: 8 a.m. through 10:00 p.m. each day - June 30: 3:00 p.m. through 10:00 p.m.	Travel to Naples, Italy, departing on June 29, 2023 and returning on July 9, 2023
July 1, 2023 through July 14, 2023	70 hours	Travel to Naples, Italy, departing on June 29, 2023 and returning on July 9, 2023

11. Third, a review of 29 bi-weekly attendance sheets obtained from Hudson County revealed that ZAMARRA's signature – which consistently appears the same in ZAMARRA employment applications, other employment records, and his financial records – varies widely across attendance sheets. The attendance sheets included below demonstrate the vast differences between ZAMARRA's purported signatures. These different signatures were repeated in batches, such that there were multiple consecutive signatures of each type. Based on my training and experience and a review of these attendance sheets, there is probable cause to believe that individuals other than ZAMARRA were, at times, signing ZAMARRA's attendance sheets on his behalf.

COUNTY OF HUDSON
BI-WEEKLY ATTENDANCE SHEET

DEPARTMENT/DIVISION PARKS, PLANNING & ENGINEERING		PAYROLL DEPT. # 89
EMPLOYEE NAME <u>ALFONSO ZAMARRA</u>	EMPLOYEE #	PAY PERIOD FROM

This record reflects the time you initially arrive and finally depart from work each day. It also reflects the time you leave for lunch and return from lunch. You must accurately reflect those times. All employees are required to record their hours of work. No employee is to record the time of another employee. Any exceptions to your normal hours of work and lunch period should be explained in the Exceptions Column. Such exceptions include absences, late arrival, early departure, or variation from the normal lunch period. Employees who do not work a full day or who take a longer lunch period are subject for being docked for the time not worked. Chronic or excessive absenteeism or lateness is a violation of County policy. Employees who violate these rules are subject to discipline.

DAY/DATE	TIME IN	EMPLOYEE SIGNATURE	LUNCH OUT	LUNCH IN	TIME OUT	EMPLOYEE SIGNATURE	EXCEPTIONS
Sat 12-7-2019							
Sun 12-8-2019							
Mon 12-9-2019							
Tues 12-10-2019							
Wed 12-11-2019							
Thurs 12-12-2019							
Fri 12-13-2019							

DAY/DATE	TIME IN	EMPLOYEE SIGNATURE	LUNCH OUT	LUNCH IN	TIME OUT	EMPLOYEE SIGNATURE	EXCEPTIONS
Sat 12-14-2019							
Sun 12-15-2019							
Mon 12-16-2019	3:00 PM	<i>[Signature]</i>			10:00 PM	<i>[Signature]</i>	
Tues 12-17-2019	3:00 PM	<i>[Signature]</i>			10:00 PM	<i>[Signature]</i>	
Wed 12-18-2019	3:00 PM	<i>[Signature]</i>			10:00 PM	<i>[Signature]</i>	
Thurs 12-19-2019	3:00 PM	<i>[Signature]</i>			10:00 PM	<i>[Signature]</i>	
Fri 12-20-2019	3:00 PM	<i>[Signature]</i>			10:00 PM	<i>[Signature]</i>	
PARK SUPERVISOR <u>MAX</u>			AUTHORIZED SIGNATURE				

35 hours

**COUNTY OF HUDSON
BI-WEEKLY ATTENDANCE SHEET**

DEPARTMENT/DIVISION PARKS, PLANNING & ENGINEERING					PAYROLL DEPT. # 89		
EMPLOYEE NAME <u>Alfonso Zamarrá</u>		EMPLOYEE # _____		PAY PERIOD FROM _____			

This record reflects the time you initially arrive and finally depart from work each day. It also reflects the time you leave for lunch and return from lunch. You must accurately reflect those times. All employees are required to record their hours of work. No employee is to record the time of another employee. Any exceptions to your normal hours of work and lunch period should be explained in the Exceptions Column. Such exceptions include absences, late arrival, early departure, or variation from the normal lunch period. Employees who do not work a full day or who take a longer lunch period are subject for being docked for the time not worked. Chronic or excessive absenteeism or lateness is a violation of County policy. Employees who violate these rules are subject to discipline.

DAY/DATE	TIME IN	EMPLOYEE SIGNATURE	LUNCH OUT	LUNCH IN	TIME OUT	EMPLOYEE SIGNATURE	EXCEPTIONS
Sat 7-17-2021	—	—	—	—	—	—	
Sun 7-18-2021	—	—	—	—	—	—	
Mon 7-19-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?
Tue 7-20-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?
Wed 7-21-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?
Thurs 7-22-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?
Fri 7-23-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?

DAY/DATE	TIME IN	EMPLOYEE SIGNATURE	LUNCH OUT	LUNCH IN	TIME OUT	EMPLOYEE SIGNATURE	EXCEPTIONS
Sat 7-24-2021	—	—	—	—	—	—	
Sun 7-25-2021	—	—	—	—	—	—	
Mon 7-26-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?
Tue 7-27-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?
Wed 7-28-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?
Thurs 7-29-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?
Fri 7-30-2021	8:00	<i>Alfonso</i>			4:00	<i>Alfonso</i>	?

PARK SUPERVISOR _____	AUTHORIZED SIGNATURE _____
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COUNTY OF HUDSON 000190

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**COUNTY OF HUDSON
BI-WEEKLY ATTENDANCE SHEET**

DEPARTMENT/DIVISION PARKS, PLANNING & ENGINEERING	PAYROLL DEPT. # 89
EMPLOYEE NAME Alfonso Zamora	EMPLOYEE #
PAY PERIOD FROM	

This record reflects the time you initially arrive and finally depart from work each day. It also reflects the time you leave for lunch and return from lunch. You must accurately reflect those times. All employees are required to record their hours of work. No employee is to record the time of another employee. Any exceptions to your normal hours of work and lunch period should be explained in the Exceptions Column. Such exceptions include absences, late arrival, early departure, or variation from the normal lunch period. Employees who do not work a full day or who take a longer lunch period are subject for being docked for the time not worked. Chronic or excessive absenteeism or lateness is a violation of County policy. Employees who violate these rules are subject to discipline.

DAY/DATE	TIME IN	EMPLOYEE SIGNATURE	LUNCH OUT	LUNCH IN	TIME OUT	EMPLOYEE SIGNATURE	EXCEPTIONS
Sat 6-18-2022	8:00	<i>[Signature]</i>			4:00	<i>[Signature]</i>	
Sun 6-19-2022							
Mon 6-20-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	
Tue 6-21-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	
Wed 6-22-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	
Thurs 6-23-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	
Fri 6-24-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	

DAY/DATE	TIME IN	EMPLOYEE SIGNATURE	LUNCH OUT	LUNCH IN	TIME OUT	EMPLOYEE SIGNATURE	EXCEPTIONS
Sat 6-25-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	
Sun 6-26-2022							
Mon 6-27-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	
Tue 6-28-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	
Wed 6-29-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	
Thurs 6-30-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	
Fri 7-1-2022	8:00	<i>[Signature]</i>	12:00	12:30	4:00	<i>[Signature]</i>	

PARK SUPERVISOR	AUTHORIZED SIGNATURE
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COUNTY OF HUDSON 000193

Afonso Zamarrá
COUNTY OF HUDSON
BI-WEEKLY ATTENDANCE SHEET

DEPARTMENT OF PARKS				PAYROLL DEPT. # 89			
EMPLOYEE NAME <i>Afonso Zamarrá</i>		EMPLOYEE #		PAY PERIOD FROM			

This record reflects the time you initially arrive and finally depart from work each day. It also reflects the time you leave for lunch and return from lunch. You must accurately reflect those times. All employees are required to record their hours of work. No employee is to record the time of another employee. Any exceptions to your normal hours of work and lunch period should be explained in the Exceptions Column. Such exceptions include absences, late arrival, early departure, or variation from the normal lunch period. Employees who do not work a full day or who take a longer lunch period are subject for being docked for the time not worked. Chronic or excessive absenteeism or lateness is a violation of County policy. Employees who violate these rules are subject to discipline.

DAY/DATE	TIME IN	EMPLOYEE SIGNATURE	LUNCH OUT	LUNCH IN	TIME OUT	EMPLOYEE SIGNATURE	EXCEPTIONS
Sat 3-25-2023	8:00 AM	<i>[Signature]</i>			10 PM	<i>[Signature]</i>	
Sun 3-26-2023	8:00 AM	<i>[Signature]</i>			10 PM	<i>[Signature]</i>	
Mon 3-27-2023							
Tue 3-28-2023							
Wed 3-29-2023							
Thurs 3-30-2023							
Fri 3-31-2023	3 PM	<i>[Signature]</i>			10 PM	<i>[Signature]</i>	

DAY/DATE	TIME IN	EMPLOYEE SIGNATURE	LUNCH OUT	LUNCH IN	TIME OUT	EMPLOYEE SIGNATURE	EXCEPTIONS
Sat 4-1-2023	8:00 AM	<i>[Signature]</i>			10 PM	<i>[Signature]</i>	
Sun 4-2-2023	8:00 AM	<i>[Signature]</i>			10 PM	<i>[Signature]</i>	
Mon 4-3-2023							
Tue 4-4-2023							
Wed 4-5-2023							
Thurs 4-6-2023							
Fri 4-7-2023	3 PM	<i>[Signature]</i>			10 PM	<i>[Signature]</i>	

PARK SUPERVISOR	AUTHORIZED SIGNATURE
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COUNTY OF HUDSON 000198

12. Moreover, approximately 16 of the 29 attendance sheets were not signed by a Parks Department supervisor, as was required. Approximately 6 of the 13 attendance sheets that bear a supervisor's signature are purportedly signed by someone who appears to have written the first name of Individual-2, a longtime Parks Department supervisor. The remaining 7 of the attendance sheets that bear a supervisor's signature appear to have the signature of Individual-2 redacted through use of White-Out or correction tape. At least 3 of the 7 redacted signatures appear to have been signed by Individual-2 in that Individual-2's first name appears faintly behind the redaction.

13. Law enforcement has spoken with Individual-2 and learned that Individual-2 did not sign the attendance sheets that seem to bear his/her name. Additionally, Individual-2 confirmed that he/she had never supervised ZAMARRA while ZAMARRA purportedly worked for the Parks Department.

14. Further, the investigation has revealed that, with few exceptions, seasonal Parks Department employees worked either 8:00 a.m. to 4:00 p.m., though some worked night shifts, which begin at 4:00 p.m., during which they patrol the playground. Many of the shifts outlined on ZAMARRA's attendance sheets, such as

3:00 p.m. to 10:00 p.m., are not shifts that are worked by seasonal Parks Department employees.

OVERVIEW OF ZAMARRA'S SCHEME TO UNLAWFULLY COLLECT UNEMPLOYMENT BENEFITS

15. A review of documents obtained from the NJDOL revealed that, on three occasions from 2020 through 2023, ZAMARRA applied for and received unemployment benefits from the State of New Jersey (the "State"), including during the COVID-19 crisis. As detailed below, ZAMARRA's applications contained materially false information. Additionally, in his applications ZAMARRA falsely alleged that he worked for Hudson County as a seasonal employee when, as described in the paragraphs above, ZAMARRA did not, in fact, work as a seasonal employee, and therefore, ZAMARRA was not entitled to receive unemployment benefits.

16. ZAMARRA first submitted an application for unemployment benefits on or about April 9, 2020 (the "April 2020 Claim"). Before submitting the April 2020 Claim, ZAMARRA certified that his "answers are correct and that [he is] aware that the law provides penalties for false statements." Despite that certification, ZAMARRA provided materially false information in the April 2020 Claim. More, specifically, ZAMARRA alleged that he worked for Apex from July 25, 1996 through March 6, 2020.⁴ This is contradicted by statements ZAMARRA made in an application for seasonal employment that he submitted to Hudson County in or about late 2019. In that Hudson County application, ZAMARRA alleged that he was unemployed and had previously worked for Apex. Additionally, when ZAMARRA included his employment with Hudson County in the April 2020 Claim, he falsely asserted that the last date that he worked for the County was April 9, 2020, rather than through July 18, 2020, the date reflected in records maintained by Hudson County.

17. As a result of these misrepresentations, in connection with the April 2020 Claim, ZAMARRA received approximately 20 payments of employment benefits from the State of New Jersey, all deposited into the Zamarra Account through interstate wire transmissions.

18. ZAMARRA submitted a second application for unemployment benefits on or about May 29, 2022 (the "May 2022 Claim"). Before submitting the May 2022 Claim, ZAMARRA certified that his "answers are correct and that [he is] aware that the law provides penalties for false statements." Despite that certification,

⁴ Additionally, in the April 2020 Claim, ZAMARRA stated that he last served as a "Storage and Distribution Managers," rather than serving as Apex's President, and alleged that the "business closed due to Covid-19."

ZAMARRA provided materially false information in the May 2022 Claim. More specifically, ZAMARRA alleged that he had previously worked for Hudson County as an “Installation, Maintenance, and Repair Worker[],” likely referring to his alleged work as a seasonal employee with Hudson County from October 23, 2021 through April 23, 2022, and that he was “la[id] off” on or about April 22, 2022. In actuality, he was not laid off, but on April 23, 2022, had simply come to the end of his 6-month maximum term of employment with the Parks Department. As noted above, seasonal employees for the Parks Department were prohibited from working more than six months during any 12-month period.

19. As a result of these misrepresentations, in connection with the May 2022 Claim, ZAMARRA received payments of unemployment benefits, all deposited into the Zamarra Account through interstate wire transmissions.

20. ZAMARRA submitted out a third application for unemployment benefits on or about November 26, 2023 (the “November 2023 Claim”). Before submitting the November 2023 Claim, ZAMARRA certified that his “answers are correct and that [he is] aware that the law provides penalties for false statements.” Despite that certification, ZAMARRA provided materially false information in the November 2023 Claim. More specifically, ZAMARRA claimed that he worked as a “Helpers – Installation, Maintenance, and Repair Worker[]”, likely referring to his alleged work as a seasonal employee with Hudson County from March 22, 2023 through September 9, 2023. ZAMARRA also claimed that he was “la[id] off” on or about September 9, 2023, when in actuality he was not laid off, but had simply come to the end of his 6-month maximum term of employment with the Parks Department.

21. As a result of these misrepresentations, in connection with the November 2023 Claim, ZAMARRA received payments of unemployment benefits, all deposited into the Zamarra Account through interstate wire transmissions.

22. In total, ZAMARRA received approximately \$16,399 in unemployment benefits during tax year 2020; approximately \$25,668 in benefits during tax year 2021; approximately \$7,056 in benefits in tax year 2022; approximately \$1,384 in benefits in 2023; and approximately \$6,574 in benefits in 2024, for a total of \$57,021. Because, as detailed herein, ZAMARRA did not, in fact, work as a seasonal employee, ZAMARRA was not entitled to receive these benefits.