



*State of New Jersey*

OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
OFFICE OF PUBLIC INTEGRITY AND ACCOUNTABILITY  
25 MARKET STREET  
PO BOX 085  
TRENTON, NJ 08625-0085

PHILIP D. MURPHY  
*Governor*

Tahesha L. Way  
*Lt. Governor*

MATTHEW J. PLATKIN  
*Attorney General*

THOMAS J. EICHER  
*Executive Director*

December 4, 2024

**VIA EMAIL**

Robert G. Stahl, Esq.  
Andrew Olesnycky, Esq.  
Stahl Gasiorowski Criminal Defense Lawyers P.C.  
53 Cardinal Drive, 3<sup>rd</sup> Floor  
Westfield, New Jersey 07090

**Re: State v. Salvatore F. Bonaccorso  
Complaint No. 2002-S-2023-000165  
Promis Gavel No. UNN-23-003861**

Dear Mr. Stahl and Mr. Olesnycky:

As you are aware, your client, Salvatore Bonaccorso (“Defendant”), is charged in the above referenced matter via complaint-summons with one count of second degree Official Misconduct, in violation of N.J.S.A. 2C:30-2(a), one count of third degree Tampering with Public Records or Information, in violation of N.J.S.A. 2C:28-7(a)(2), one count of third degree Tampering with Witnesses and Informants, in violation of N.J.S.A. 2C:28-5(a)(1), one count of fourth degree Forgery, in violation of N.J.S.A. 2C:21-1(a)(2), and one count of fourth degree Falsifying or Tampering with Records, in violation of N.J.S.A. 2C:21-4(a). This letter sets forth the State’s plea offer in the above referenced matter between Defendant and the State, and it supersedes any prior plea offers that the State may have made and any previous plea discussions with the State. Unless specifically set forth herein, it does not encompass any other pending or unindicted matters.

The State will accept a guilty plea from Defendant to both counts of a two-count Accusation to be filed by the State, charging Defendant with third degree Conspiracy to commit Official Misconduct, in violation of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:30-2(a) (Count 1), and fourth degree Forgery, in violation of N.J.S.A. 2C:21-1(a)(2) (Count 2). If Defendant enters a guilty plea to these charges, is sentenced on these charges, and fully complies with the terms specified below, the State agrees to move to dismiss the remaining charges set forth in the pending Complaint-Summons No. 2002-S-2023-000165, will not prosecute Defendant for any other disclosed criminal violations arising out of the Defendant’s use of Township of Clark property, resources, equipment or employees to conduct work related to the operation of Defendant’s private underground storage tank (UST) removal company, Bonaccorso & Son LLC, or arising out of Defendant’s filing of false or fraudulent permit applications for UST removal permits with various New Jersey municipalities, and will recommend that Defendant be sentenced to a term of noncustodial

probation for a period of three (3) years.

As a condition of the plea arrangement, Defendant must voluntarily forfeit any and all public employment and must further agree to be forever disqualified from holding any office or position of honor, trust, or profit under the State or any of its administrative or political subdivisions, under N.J.S.A. 2C:51-2. Defendant agrees to execute a Consent Order to this effect at the time of this plea.

As a condition of the plea arrangement, Defendant further voluntarily agrees to be debarred, personally or through any business entity, from doing business with the State of New Jersey or any of its administrative or political subdivisions for a period of five (5) years, under N.J.S.A. 2C:51-2f. As such, Defendant agrees that he, personally or through any business entity, shall be ineligible, either directly or indirectly, to submit a bid, enter into any contract, or to conduct any business with any board, agency, authority, department, commission, public corporation, or other body of this State, of this or one or more other states, or of one or more political subdivisions of this State, for a period of five (5) years. It is the purpose of this provision to bar the Defendant and any business, including any corporation, partnership, association or proprietorship in which Defendant is a principal, or with respect to which he owns or controls, directly or indirectly, 5% or more of the stock or other equity interest, from conducting business with public entities. Defendant agrees to execute a Consent Order to this effect at the time of this plea.

As a condition of the plea arrangement, Defendant, in his capacity as a principal and owner of Bonaccorso & Son LLC, further voluntarily agrees that Bonaccorso & Son LLC shall likewise be debarred from doing business with the State of New Jersey or any of its administrative or political subdivisions for a period of five (5) years. Defendant agrees that Bonaccorso & Son shall be ineligible, either directly or indirectly, to submit a bid, enter into any contract, or to conduct any business with any board, agency, authority, department, commission, public corporation, or other body of this State, of this or one or more other states, or of one or more political subdivisions of this State, for a period of five (5) years. It is the purpose of this provision to bar Bonaccorso & Son LLC, and any business, including any corporation, partnership, association or proprietorship, with respect to which Bonaccorso & Son LLC owns or controls, directly or indirectly, 5% or more of the stock or other equity interest, from conducting business with public entities. Defendant, in his capacity as a principal and owner of Bonaccorso & Son LLC, agrees to execute a Consent Order on behalf of Bonaccorso & Son LLC to this effect at the time of this plea.

As a condition of the plea arrangement, Defendant further voluntarily agrees to be debarred, personally or through any business entity, from doing business in any way related to underground storage tanks, including but not limited to the removal and/or disposal of

underground storage tanks, for or on behalf of any private or commercial customers or entities for a period of three (3) years. As such, Defendant agrees that he, personally or through any business entity, shall be ineligible, either directly or indirectly, to submit a bid, enter into any contract, or to conduct any business related to underground storage tanks, including but not limited to the removal and/or disposal of underground storage tanks, with any private or commercial customer or entity for a period of three (3) years. It is the purpose of this provision to bar the Defendant and any business, including any corporation, partnership, association or proprietorship in which Defendant is a principal, or with respect to which he owns or controls, directly or indirectly, 5% or more of the stock or other equity interest, from conducting business related to underground storage tanks, including but not limited to the removal and/or disposal of underground storage tanks, with any private or commercial customer or entity. Defendant agrees to execute a Consent Order to this effect at the time of this plea.

As a condition of the plea arrangement, Defendant, in his capacity as a principal and owner of Bonaccorso & Son LLC, further voluntarily agrees that Bonaccorso & Son LLC, shall likewise be debarred from doing business in any way related to underground storage tanks, including but not limited to the removal and/or disposal of underground storage tanks, for or on behalf of any private or commercial customers or entities for a period of three (3) years. As such, Defendant agrees that Bonaccorso & Son LLC shall be ineligible, either directly or indirectly, to submit a bid, enter into any contract, or to conduct any business related to underground storage tanks, including but not limited to the removal and/or disposal of underground storage tanks, with any private or commercial customer or entity for a period of three (3) years. It is the purpose of this provision to bar Bonaccorso & Son LLC, and any business, including any corporation, partnership, association or proprietorship, with respect to which Bonaccorso & Son LLC owns or controls, directly or indirectly, 5% or more of the stock or other equity interest, from conducting business related to underground storage tanks, including but not limited to the removal and/or disposal of underground storage tanks, with any private or commercial customer or entity. Defendant agrees to execute a Consent Order on behalf of Bonaccorso & Son LLC to this effect at the time of this plea.

As a condition of the plea arrangement, Defendant also agrees not to make application for admission to the Pretrial Intervention Program.

Defendant also affirmatively represents that he/she is not a "drug or alcohol dependent person," as that term is defined by N.J.S.A. 2C:35-2 or under any other definition of that term. Defendant further represents: (1) that he was not drug or alcohol dependent at the time(s) that he committed the offense(s) to which he is now pleading guilty; (2) that he did not commit the offense(s) to which he/she is now pleading while under the influence of a controlled dangerous substance, controlled dangerous substance analog or alcohol; and (3) that he did not commit the offenses to which he is now pleading in order to acquire property or monies in order to support a drug or alcohol dependency. Defendant further recognizes that these representations are material to this proceeding and that if Defendant should at any subsequent time make conflicting or inconsistent representations, he can be deemed, at the State's sole election, to have provided

materially false, incomplete or misleading information, without the necessity of the State having to show which of the conflicting or inconsistent statements is false.

Defendant is aware that the sentencing Court may impose a criminal fine of up to \$15,000 for any crime of the third degree, pursuant to N.J.S.A. 2C:43-3(b)(1), and a criminal fine of up to \$10,000 for any crime of the fourth degree, pursuant to N.J.S.A. 2C:43-3(b)(2), or an amount equal to double the pecuniary gain of the Defendant or loss to the victims under N.J.S.A. 2C:43-3e, whichever is greater.

As a further condition of the plea arrangement, the State shall recommend that the Court order Defendant to pay a fine of \$15,000, pursuant to N.J.S.A. 2C:43-3(b)(1), and Defendant expressly agrees to join the State in requesting that the Court impose such fine. Defendant further agrees to pay such fine in installments of \$5,000 per year for a period of three (3) years, or pursuant to such other schedule as may be designated by the Court.

If, prior to sentencing, the State determines that Defendant has failed to satisfy any of these conditions, has intentionally given materially false, incomplete, or misleading testimony or information, or should Defendant withdraw from his plea agreement or participate or attempt to participate in any criminal act after the date of the agreement and before sentencing, the State may void the plea agreement, in its sole discretion, and prosecute the Defendant for any criminal violation of which the State has knowledge, including but not limited to Perjury, False Swearing, and Obstruction of Justice. Any prosecution that is not time-barred by the applicable statute of limitations on the date the plea agreement is signed may be commenced against Defendant notwithstanding the expiration of the statute of limitations after the date the agreement is signed, and Defendant explicitly agrees to waive any statute of limitations defense as to any such prosecution. Any such prosecution may be based upon any statements and information provided by Defendant, and all such statements and information may be used against him in the State's direct case or in rebuttal, or both. To the extent that anything in the plea agreement is deemed inconsistent with N.J.R.E. 410, Defendant and you will waive the provisions of N.J.R.E. 410, except that Defendant does not waive the protections of N.J.R.E. 410 in any prosecution following Defendant's successful withdrawal from his plea agreement.

If Defendant, without good cause, fails to appear for sentencing on the appointed date, having previously received notice thereof, and a bench warrant issues for his arrest, Defendant may not withdraw the guilty plea, but the State will not be bound by its recommended sentence set forth herein. Instead, Defendant will be subject to the maximum sentence allowed by law for each charge to which he has pleaded guilty, and the State may make any recommendation as to the appropriate sentence, including a recommendation for the maximum statutory sentence, including any mandatory/discretionary extended term or parole ineligibility (*i.e.*, up to 5 years incarceration in State Prison), and whether any such sentences should be served concurrently or consecutively, if Defendant is to be sentenced on more than one charge.

Any plea agreement is limited to the Office of Public Integrity and Accountability, and

cannot bind federal prosecuting authorities nor does it prohibit the State, any agency thereof, or any third party from instituting any civil proceedings directly or indirectly involving Defendant.

The State of New Jersey specifically reserves the right to correct factual misstatements relating to sentencing proceedings, to correct factual misstatements in the Presentence Report, to appeal Defendant's sentence as may be authorized by law, and to oppose Defendant's appeal of any sentence or conviction.

Defendant shall provide copies to the State of any and all financial information requested by or provided to the Probation Department or the Court in connection with the presentence report or sentencing, or both.

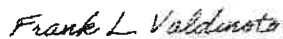
If this plea offer is not accepted by the close of business on December 20, 2024, it is withdrawn. The State may revoke this plea offer at any time before its expiration, in its sole discretion.

No additional promises, agreements, or conditions have been entered into with the Defendant other than those set forth in this letter, and none will be entered into unless in writing and signed by both parties.

Very truly yours,



Jeffrey J. Manis  
Assistant Attorney General  
Office of Public Integrity & Accountability



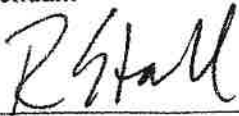
Frank L. Valdinoto  
Deputy Attorney General  
Office of Public Integrity & Accountability

I have read this letter and have discussed its terms with my attorney. My signature below acknowledges that it fully sets forth my agreement with the Office of Public Integrity and Accountability, and I understand and agree to its terms. There have been no additional promises or representations made to me by any officials or employees of the State or by my attorney in connection with this matter. Under R. 3:13-3, I acknowledge that I have received full discovery from the State.



SALVATORE F. BONACCORSO,  
Defendant

Dated: 12/18/24.



ROBERT G. STAHL, ESQ.,  
Counsel to Defendant Salvatore F. Bonaccorso

Dated: 12/18/24



ANDREW OLESNYCKY, ESQ.  
Counsel to Defendant Salvatore F. Bonaccorso

Dated: 12/18/24

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
BY: JEFFREY J. MANIS ID: 040772001  
FRANK L. VALDINOTO ID: 123202014  
ASSISTANT ATTORNEY GENERAL  
DIVISION OF CRIMINAL JUSTICE  
OFFICE OF PUBLIC INTEGRITY AND ACCOUNTABILITY  
240 CEDAR KNOLLS ROAD  
CEDAR KNOLLS, NEW JERSEY 07927

SUPERIOR COURT OF NEW JERSEY  
COUNTY OF UNION  
LAW DIVISION – CRIMINAL  
ACCUSATION NO. 25-01-00001A  
PG NO. UNN-23-003861

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STATE OF NEW JERSEY, :  
:  
v. :  
SALVATORE F. BONACCORSO, :  
Defendant. :

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CRIMINAL ACTION

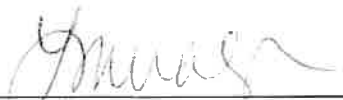
**ORDER OF FORFEITURE AND  
PERMANENT DISQUALIFICATION  
FROM FUTURE PUBLIC OFFICE  
OR EMPLOYMENT**

Defendant SALVATORE F. BONACCORSO, who currently serves as the Mayor of the Township of Clark, having entered a guilty plea to Count 1 of an Accusation (Accusation No. 25-01-00001A), charging him with one count of third degree Conspiracy to commit Official Misconduct, in violation of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:30-2(a), and said offense having involved or touched upon his public office, position, or employment; and defendant having consented to the form and entry of this Order, and good cause having been shown therefor;


It is on this 10<sup>th</sup> day of January, 2025:


**ORDERED, ADJUDGED AND DECREED** that, pursuant to N.J.S.A. 2C:51-2, the defendant SALVATORE F. BONACCORSO shall forfeit any and all public offices or employment and shall be forever disqualified from holding any office or position of honor, trust


or profit under the State or any of its administrative or political subdivisions. Defendant SALVATORE F. BONACCORSO further understands that if he should make any future application for public office or employment, or should he take any affirmative steps to seek to campaign or run for or be appointed or elected to public office in violation of this Order, he will be subject to an additional charge under N.J.S.A. 2C:29-9a (fourth-degree Contempt of Court).

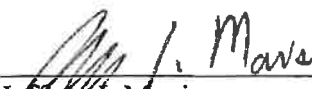
  
\_\_\_\_\_  
HON. LISA MIRALLES WALSH, A.J.S.C.

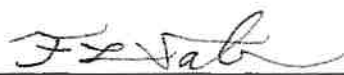
I hereby consent to the form  
and entry of the above Order

  
\_\_\_\_\_  
Salvatore F. Bonaccorso  
DEFENDANT  
Dated:

  
\_\_\_\_\_  
Robert G. Stahl, Esq.  
ATTORNEY FOR DEFENDANT  
Dated:

  
\_\_\_\_\_  
Andrew Olesnycky, Esq.  
ATTORNEY FOR DEFENDANT  
Dated:

  
\_\_\_\_\_  
Jeffrey J. Manis  
ASSISTANT ATTORNEY GENERAL  
Dated:

  
\_\_\_\_\_  
Frank L. Valdinoto  
DEPUTY ATTORNEY GENERAL  
Dated:



MATTHEW J. PLATKIN  
 ATTORNEY GENERAL OF NEW JERSEY  
 ATTORNEY FOR PLAINTIFF  
 BY: JEFFREY J. MANIS  
 ATTORNEY ID: 040772001  
 ASSISTANT ATTORNEY GENERAL  
 OFFICE OF PUBLIC INTEGRITY AND ACCOUNTABILITY  
 240 CEDAR KNOLLS ROAD  
 CEDAR KNOLLS, NEW JERSEY 07927

SUPERIOR COURT OF NEW JERSEY  
 LAW DIVISION - UNION COUNTY  
 ACCUSATION NO. 25-01-00001A  
 PG NO. UNN-23-003861  
 COMPLAINT NO. 2002 S 2023 000165

\_\_\_\_\_  
 STATE OF NEW JERSEY, :  
 :  
 v. :  
 SALVATORE F. BONACCORSO, :  
 Defendant. :

CRIMINAL ACTION  
**CONSENT DEBARMENT  
 ORDER**  
 (as to Bonaccorso & Son LLC)

Defendant, SALVATORE F. BONACCORSO, having entered a guilty plea to one count of Conspiracy to commit Official Misconduct, in violation of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:30-2(a) (third degree), and one count of Forgery, in violation of N.J.S.A. 2C:21-1(a)(2) (fourth degree), and defendant, as a principal and owner of BONACCORSO & SON LLC, having consented to the form and entry of this Order on behalf of BONACCORSO & SON LLC, and for good cause shown;

It is on this 10<sup>th</sup> day of January, 2025, hereby **ORDERED, ADJUDGED AND DECREED** that:


1. BONACCORSO & SON LLC shall be ineligible, either directly or indirectly, to submit a bid, enter into any contract, or to conduct any business with any board, agency, authority, department, commission, public corporation, or any other body of this State, of this or one or more other States, or of one or more political subdivisions of this State


for a period of five (5) years from the date of the entry of this Order. It is the purpose of this Order to bar BONACCORSO & SON LLC and any business, including any corporation, partnership, association or proprietorship, with respect to which BONACCORSO & SON LLC owns, directly or indirectly, or controls 5% or more of the stock or other equity interest of such business, from conducting business with public entities.


2. BONACCORSO & SON LLC shall further be ineligible, either directly or indirectly, to submit a bid, enter into any contract, or to conduct any business related to underground storage tanks, including but not limited to the removal and/or disposal of underground storage tanks, with any private or commercial customer or entity for a period of three (3) years from the date of the entry of this Order. It is the purpose of this Order to bar BONACCORSO & SON LLC and any business, including any corporation, partnership, association, or proprietorship, with respect to which BONACCORSO & SON LLC owns, directly or indirectly, or controls 5% or more of the stock or other equity interest, from conducting business related to underground storage tanks, including but not limited to the removal and/or disposal of underground storage tanks, with any private or commercial customer or entity.


  
\_\_\_\_\_  
HON. LISA MIRALLES WALSH, A.J.S.C.


I hereby consent to the form  
and entry of the above Order

  
\_\_\_\_\_  
BONACCORSO & SON LLC  
By: Salvatore F. Bonaccorso, as principal and owner

  
\_\_\_\_\_  
ROBERT G. STAHL, ESQ.,  
Attorney for Defendant Salvatore F. Bonaccorso

  
\_\_\_\_\_  
ANDREW OLESNYCKY, ESQ.  
Attorney for Defendant Salvatore F. Bonaccorso

  
\_\_\_\_\_  
JEFFREY J. MANIS  
Assistant Attorney General

  
\_\_\_\_\_  
FRANK L. VALDINOTO  
Deputy Attorney General

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
ATTORNEY FOR PLAINTIFF  
BY: JEFFREY J. MANIS ID: 040772001  
ASSISTANT ATTORNEY GENERAL  
OFFICE OF PUBLIC INTEGRITY AND ACCOUNTABILITY  
240 CEDAR KNOLLS ROAD  
CEDAR KNOLLS, NEW JERSEY 07927

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - UNION COUNTY  
ACCUSATION NO. 25-01-00001A  
PG NO. UNN-23-003861  
COMPLAINT NO. 2002 S 2023 000165

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STATE OF NEW JERSEY, :  
 :  
 v. :  
 SALVATORE F. BONACCORSO, :  
 Defendant. :

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CRIMINAL ACTION  
**CONSENT DEBARMENT  
ORDER**  
(as to Defendant Salvatore F. Bonaccorso)

Defendant, SALVATORE F. BONACCORSO, having entered a guilty plea to one count of Conspiracy to commit Official Misconduct, in violation of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:30-2(a) (third degree), and one count of Forgery, in violation of N.J.S.A. 2C:21-1(a)(2) (fourth degree), and defendant having consented to the form and entry of this Order, and for good cause shown;

It is on this 10<sup>th</sup> day of January, 2025, hereby **ORDERED, ADJUDGED AND DECREED** that:

1. Defendant SALVATORE F. BONACCORSO, personally or through any business entity, shall be ineligible, either directly or indirectly, to submit a bid, enter into any contract, or to conduct any business with any board, agency, authority, department, commission, public corporation, or any other body of this State, of this or one or more other States, or of one or more political subdivisions of this State for a period of five (5) years from

the date of the entry of this Order. It is the purpose of this Order to bar defendant and any business, including any corporation, partnership, association or proprietorship, in which the defendant is a principal, or with respect to which the defendant owns, directly or indirectly, or controls 5% or more of the stock or other equity interest of such business, from conducting business with public entities.

2. Defendant SALVATORE F. BONACCORSO, personally or through any business entity, shall be ineligible, either directly or indirectly, to submit a bid, enter into any contract, or to conduct any business related to underground storage tanks, including but not limited to the removal and/or disposal of underground storage tanks, with any private or commercial customer or entity for a period of three (3) years from the date of the entry of this Order. It is the purpose of this Order to bar the defendant and any business, including any corporation, partnership, association, or proprietorship in which defendant is a principal, or with respect to which he owns or controls, directly or indirectly, 5% or more of the stock or other equity interest, from conducting business related to underground storage tanks, including but not limited to the removal and/or disposal of underground storage tanks, with any private or commercial customer or entity.



HON. LISA MIRALLES WALSH, A.J.S.C.

I hereby consent to the form  
and entry of the above Order



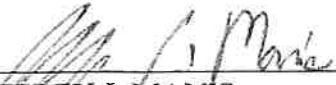
SALVATORE F. BONACCORSO  
Defendant



ROBERT G. STAHL, ESQ.,  
Attorney for Defendant Salvatore F. Bonaccorso



ANDREW OLESNYCKY, ESQ.  
Attorney for Defendant Salvatore F. Bonaccorso

  
\_\_\_\_\_  
JEFFREY J. MANIS  
Assistant Attorney General

  
\_\_\_\_\_  
FRANK L. VALDINOTO  
Deputy Attorney General