

**MASSENA VILLAGE COURT  
COUNTY OF ST. LAWRENCE: STATE OF NEW YORK**

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PEOPLE OF THE STATE OF NEW YORK,

**MISDEMEANOR  
COMPLAINT**

-against-

**Docket No.** \_\_\_\_\_

ROSS VIOLI and DOMINICK VIOLI,

Defendants.

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Investigator Joel Cordone, Shield # 2377, of the New York State Office of the Attorney General, being duly sworn, deposes and says:

On or about April 24, 2014, at 209 Center Street, Massena, New York 13662 in the County of St. Lawrence, State of New York, defendants:

**Ross Violi**, residing at 70 Wolverine Pt., Massena, New York 11362

DOB: 12/28/1937

and

**Dominick Violi**, residing at 6 Churchill Avenue, Massena, New York 11362

DOB: 01/15/1935

did violate **Sections 145 (penalties) of the Labor Law of the State of New York (unclassified misdemeanor) (1 count each) in that the defendants, did illegally employ a minor in violation of Section 133(2)(e) of the Labor Law of the State of New York**; to-wit: any person who knowingly violates article 4 of the Labor Law and any officer or agent of a corporation who knowingly permits the corporation to violate article 4 of the Labor Law in that they knowingly allowed a minor of any age to be

employed in or assist in adjusting belts to machinery or cleaning, oiling or wiping machinery as described below:

**COUNT I**

I am informed by Brett Bouchard that on April 24, 2014, defendants Ross Violi and Dominick Violi were the officers or agents of Violi's Inc. dba Violi's Restaurant, located at 209 Center Street, Massena, St. Lawrence County, New York ("Violi's Restaurant"), and that the defendants knowingly employed [REDACTED], a 17-year-old minor whose date of birth is June 4, 1996, and assigned him to clean a pasta making machine known as "La Parmigiana Model D. 55," in violation of Labor Law §133(2)(e).

The above is based upon both personal knowledge and upon information and belief, the source of which is included, but not limited to my interview of [REDACTED] and statements of Dominick Violi and Ross Violi conducted by the Department of Labor.

**ANY FALSE STATEMENT MADE IN THIS INFORMATION IS PUNISHABLE AS A CLASS A MISDEMEANOR PURSUANT TO SECTION 210.45 OF THE PENAL LAW**

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Investigator Joel Cordone, Shield # 2377, OAG  
Dated: November \_\_\_\_, 2014