
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. :
 :
 MICHAEL J. MANZO :
 DENIS JASLOW, and :
 JOSEPH CASTAGNA : Mg. No. 09-8135 (MCA)

I, Robert J. Cooke, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

In or about May 2009, in Hudson County, in the District of New Jersey and elsewhere, defendants

MICHAEL J. MANZO
DENIS JASLOW, and
JOSEPH CASTAGNA

and others, did knowingly and willfully conspire to obstruct, delay, and affect interstate commerce by extortion under color of official right, by accepting and agreeing to accept corrupt payments that were paid and to be paid by another, with that person's consent, in exchange for defendant Michael Manzo's future official assistance in Jersey City Government matters.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

Robert J. Cooke, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
July ____, 2009, at Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

I, Robert J. Cooke, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have personally participated in this investigation and am aware of the facts contained herein, based upon my own investigation, as well as information provided to me by other law enforcement officers. Because this Attachment A is submitted for the limited purpose of establishing probable cause, I have not included herein the details of every aspect of the investigation. Statements attributable to individuals contained in this Attachment A are related in substance and in part, except where otherwise indicated. All contacts discussed herein were recorded, except where otherwise indicated.

1. At all times relevant to this Complaint, defendant Denis Jaslow (hereinafter "defendant Jaslow") was an investigator for the Hudson County Board of Elections and, formerly, a Senior Correction Officer with East Jersey State Prison, Department of Corrections.

2. At all times relevant to this Complaint, defendant Michael J. Manzo (hereinafter "defendant Manzo"), a Jersey City Fire Arson Investigator, was an independent candidate seeking to represent Ward B on the City Council in Jersey City, New Jersey, which election was held on or about May 12, 2009. Defendant Manzo's bid was unsuccessful.

3. At all times relevant to this Complaint, defendant Joseph Castagna (hereinafter "defendant Castagna") served as the Health Officer with the Jersey City Department of Health and Human Services ("HHS") and was a close associate of defendant Manzo.

4. At all times relevant to this Complaint, there was a cooperating witness (the "CW") who had been charged with bank fraud in a federal criminal complaint in May 2006. Thereafter, for the purposes of this investigation conducted by the FBI, the CW posed as a real estate developer interested in development in the greater Jersey City area. The CW represented that the CW did business in numerous states, including New York and New Jersey, and that the CW paid for goods and services in interstate commerce.

5. On or about May 6, 2009, defendant Jaslow, defendant Manzo, defendant Castagna and the CW met at a restaurant in North Bergen, New Jersey. During this meeting, defendant Manzo and defendant Castagna listened as the CW explained that the CW was "doing a deal on Garfield Avenue." Defendant Manzo wanted to know, "What kind of a deal?" and the CW further explained that he wanted to transform the previously "contaminated site [which

defendant Manzo indicated he knew of]" to the home of "150 condos." Defendant Manzo said, "Okay," and then listened to the CW explain, "So the first thing I gotta do is get a zone change and then go before the Planning Board, that's what my engineers and people tell me." Defendant Manzo asked the CW, "You're not displacing any residents are you?" and, when the CW answered no, defendant Manzo shrugged his shoulders and gestured to indicate the CW should not have any issues. The CW then explained that "some people on the [City] Council, they have a problem with height." Later in the conversation, defendant Manzo was informed by the CW that the CW was "talking coming in for a zone change in early July and then the Planning Board sometime in September . . . and," the CW continued, "I want to make sure I got your support [referring to defendant Manzo should he be elected to City Council]." Defendant Manzo said, "Is this going to be an abated property?", and the CW replied that he was not looking for any "special abatements." Making an observation about what the CW was looking for, defendant Manzo stated, "You want the help to get the project going," to which the CW said, "Yeah. I just want to make sure my stuff gets, my, my zone changes, if I come in my stuff gets expedited . . ." Defendant Manzo and the CW then discussed the CW's plans for parking and retail at the Garfield Avenue site. Of the plans, defendant Manzo said, "Sounds good to me." In response to the CW's statement, "I don't know, you know, if Denis [Jaslow] told you, you know, but there's people like Democrat, Republican, but I'm in the green party, I don't like any conflicts, you understand?" Defendant Manzo laughed and said, "Green is like gold, right?" The CW said, "That's right, I don't have gold in my house, but green I have. So, you know, if it's okay with you, you know, maybe I'll do five thousand and another five after the election." Defendant Manzo continued to eat his sandwich and look across the table toward defendant Castagna as the CW spoke about the payment, and defendant Castagna then changed the subject to statewide elections.

6. Minutes later, the CW stated to defendant Manzo, "Just make sure my name doesn't show up on any of these lousy reports or anything, I don't need any conflict issues." Defendant Manzo agreed and said, "Talk to them [pointing across the table at defendant Jaslow and defendant Castagna], no problem. Everything's fine with me." When the CW said, "Okay, good, because I don't need people talking about me, I don't need any issues," defendant Manzo replied, "They'd be talking about me, too." Defendant Manzo continued to listen and nod his head in the affirmative as the CW explained, "I do business my way, under the radar, and that's it." The CW asked about meeting the following day, and defendant Manzo told the CW, "If I can't, then Joe [Castagna] will be there." The CW told defendant Manzo,

"Okay I'll give him [referring to defendant Castagna] the five thousand and then he'll do whatever he gotta do with it, you know sometimes, before the election, they need like street cash and stuff, whatever you want, I don't care." Defendant Manzo nodded his head in agreement as the CW spoke, while defendant Castagna can be heard in the background stating to the CW, "Just call me before you come." Defendant Manzo was informed by the CW, "Just make sure you expedite my stuff, that's all I ask, I don't want to be on the bottom of the pile," to which defendant Manzo replied, "the whole building department has to be revamped to the point where it becomes user friendly to the people that are coming there. If friends of friends get to the top all the time, then you got worthwhile projects and this is money, time is money . . . They should never turn away someone who is looking to make it better." The CW said, "[Y]ou can't always fault them . . . so if there's 100 [applications] that come in on July 1, I don't want to be on the bottom of the pile, that's all I ask, I want my friends to take care of me, so as long as I can rely on you, you got me in your corner." Defendant Manzo told the CW, "You can rely on me to expedite."

7. Later in the conversation, defendant Manzo told the CW that he hoped the CW would "choose something closer to me too in the future," to which the CW asked, "You talking about Jersey City?", and defendant Manzo replied, "No, closer into the B Ward [the ward which he was running to represent on city council]." As the conversation continued, the CW said, "[Y]ou'll steer me in the right direction," and defendant Manzo then stated, "Especially if we provide the ease." The CW said, "Ease is always good," and a smiling defendant Manzo nodded yes in response.

8. As the meeting was concluding, defendant Manzo and the CW shook hands and the CW said, "So I'll meet your partner here [referring to defendant Castagna] tomorrow." When parting ways and shaking hands, defendant Manzo was assured by the CW that the CW would "do the five thousand in cash with [defendant Castagna] tomorrow [to which defendant Manzo nodded yes]." The CW continued on, recounting the future official action defendant Manzo would take in exchange for the payment from the CW: "Just make sure my name's nowhere, that's all I ask [to which defendant Manzo shook his head left and right, indicating the CW's name would not be listed anywhere]. And then I'll give you another five after the election . . . Just make sure you expedite my stuff, that's all I ask." In response to this request for future official action, defendant Manzo told the CW, "I think you deserve that." Defendant Manzo and the CW continued to talk as they exited the restaurant. In response to

the CW's concerns about being "on the bottom of the pile," defendant Manzo assured the CW, "I'll walk you through it . . . I'll have the extra time, because I'll retire from my one job and I'll be doing this [serving as an elected official] full time."

9. In the parking lot, after defendant Manzo and defendant Castagna departed, defendant Jaslow raised the issue of the introductions to officials and candidates that he had facilitated for the CW. The CW said, "So, I'll bring something for you tomorrow [meaning a cash payment]. Keep on bringing me guys like this that can help me expedite." Defendant Jaslow began to complain about other projects, and the CW responded, "one this at a time," to which defendant Jaslow responded, "[Cause] I gotta make checks [meaning defendant Jaslow may have to convert cash payments made by the CW to candidates in exchange for their anticipated official action into checks to pass to the candidates to conceal the nature of the corrupt payment]."

10. On or about May 7, 2009, defendant Jaslow, defendant Castagna and the CW met as planned at the same North Bergen restaurant where they had dined on the previous day. Defendant Castagna told the CW that defendant Manzo was "working" because "Thursday's his arson job." Once inside the restaurant, they continued to discuss defendant Manzo. Defendant Castagna said that defendant Manzo was "a hard worker." Defendant Castagna continued: "Some people have stuff and you despise them. Anything he's got, he worked hard for it."

11. Minutes later, FBI agents witnessed defendant Castagna accept an unsealed envelope containing \$5,000 in cash to be passed to defendant Manzo in exchange for defendant Manzo's anticipated official action as the CW stated: "So like I was telling you and [defendant] Mike [Manzo] yesterday, this here is five thousand green ones [meaning cash]." Defendant Castagna said, "Thank you," and the CW replied, "You're welcome. Just make sure, you know, that [defendant Manzo] remembers me . . ." at which point defendant Castagna interjected and asked the CW, "Do I gotta seal this up [referring to the unsealed envelope containing the \$5,000 in cash]?" The CW said, "Do whatever you want with it - give it to him . . ." and defendant Castagna assured the CW, "I'll give it to [defendant Manzo] tonight." The CW told defendant Castagna, "Just make sure when I do my Garfield Avenue zone change, I got [defendant Manzo's] vote." Defendant Castagna again assured the CW: "Oh we'll be there for you, you gotta be kidding me. That's not even - that's done." The CW added, "And then next week after [defendant Manzo] wins, I'll give him another five thousand like this, just don't put my name

on anything." Defendant Jaslow said, "Well we're going to have another meeting next week anyway."

12. Later in the conversation, when asked by the CW, "So if [defendant Manzo] says something, he doesn't forget right? So he tells ya, when he says I got his support, when he says expedite the vote, he's a man of his word, right?", defendant Castagna replied, "We wouldn't be here." The CW said, "[D]on't put my name on anything," and defendant Castagna replied, "Oh, I know."

13. At the conclusion of the meal, defendant Castagna, who had the envelope containing the \$5,000 cash under his arm, made arrangements for defendant Manzo and the CW to meet on the following Monday, May 11, 2009, the day before the City Council election in Jersey City. Regarding defendant Manzo, defendant Castagna told the CW, "I'll see him right about 5:30 tonight and be with him all night." When the CW asked, "So you'll give [defendant Manzo] that [referring to the envelope containing the \$5,000 cash]," defendant Castagna replied, "Yes." As they exited the restaurant, also referring to defendant Manzo, the CW said, "Make sure he has me in his corner for support, he expedites my stuff on Garfield . . ." Defendant Castagna assured the CW, "I completely understand that." The CW added, "Don't put my name on anything and I'll give [defendant Manzo] another five after the election." Defendant Castagna responded by saying, "Thank you." The three agreed to meet again at "twelve o'clock Monday [May 11]," and defendant Castagna commented to defendant Jaslow, "We'll bring Mike [referring to defendant Manzo]." Defendant Castagna then departed.

14. Defendant Jaslow followed the CW to the CW's car. In response to the CW's comment regarding defendant Castagna that "[h]e seemed like a good guy, Joe," defendant Jaslow said, "He's a great guy. He's a good guy to know too, you know . . . He knows his people." The CW then told defendant Jaslow, "Guys that I can operate like this, the green party way, fine," and defendant Jaslow laughed. Moments later, defendant Jaslow accepted an unsealed envelope from the CW containing \$2,500 in cash. As defendant Jaslow took the envelope from the CW, defendant Jaslow jokingly asked the CW, "Does it got my name on it?" The CW said, "No, I don't have your name on it. Here's twenty-five hundred [referring to the contents of the envelope]." Defendant Jaslow asked the CW, "What happened? I thought you were hooking me up, man? You're cuttin' me down. You told me you were gonna give me the same as you were gonna give the guy [meaning defendant Jaslow expected to receive \$5,000 just as defendant Manzo had]."