

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No.
RICHARD F. PELLEGRINI : Title 31, United States Code,
Section 5324 and Title 18,
United States Code, Section 2

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges as follows:

COUNT ONE

**(Structuring Financial Transactions - Title 31, United States
Code, Section 5324(a)(3), and Title 18, United States Code,
Section 2)**

1. At all times relevant to this Indictment unless
otherwise stated:

a. Defendant RICHARD F. PELLEGRINI was a resident
of Bayonne, New Jersey and was employed as an oil tank inspector.
Defendant RICHARD F. PELLEGRINI was also self-employed as a
painter.

b. Defendant RICHARD F. PELLEGRINI maintained
personal checking accounts, in his name, at Bayonne Community
Bank, Bayonne, New Jersey (hereinafter "Bayonne Community") and
at North Fork Bank, Bayonne, New Jersey (hereinafter "North
Fork").

c. A.P., a co-conspirator not named as a defendant herein, the wife of defendant RICHARD F. PELLEGRINI, maintained a personal checking account, in her name, at Washington Mutual Bank, Bayonne, New Jersey (hereinafter "Washington Mutual").

d. Each of the banks referred to in Paragraphs 1b and 1c of this Count were domestic financial institutions within the meaning of Title 31, United States Code, Section 5313(a), and Title 31, Code of Federal Regulations, Sections 103.11 and 103.22(a). Under these provisions of federal law, among others, financial institutions, including the banks referred to in Paragraphs 1b and 1c of this Count, were required to file Currency Transaction Reports with the Internal Revenue Service for each deposit, withdrawal, exchange of currency, or other payment and transfer, by, through, or to such financial institution that involved a transaction of currency of more than \$10,000.00.

2. From on or about March 11, 2005 to on or about September 5, 2006, in the District of New Jersey and elsewhere, defendant

RICHARD F. PELLEGRINI,

for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations issued thereunder, knowingly structured, assisted in structuring, and attempted to structure and assist in structuring, transactions with domestic financial institutions, namely, Bayonne Community Bank, North Fork Bank, and Washington Mutual Bank, by depositing and causing to be deposited at least \$1.9 million in United States currency in approximately 353 separate transactions, each in amounts of less than \$10,000.

In violation of Title 31, United States Code, Sections 5324(a)(3) and (d)(1), and Title 18, United States Code, Section 2.

COUNTS TWO THROUGH FIFTY-FOUR

(Causing and Attempting to Cause Banks to Fail to File CTRs - Title 31, United States Code, Section 5324(a)(1), and Title 18, United States Code, Section 2)

1. The allegations set forth in Paragraph 1 of Count One of this Indictment are hereby realleged as if set forth fully herein.

2. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

RICHARD F. PELLEGRINI,

for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations issued thereunder, knowingly caused and attempted to cause domestic financial institutions, namely, Bayonne Community Bank, North Fork Bank, and Washington Mutual Bank, to fail to file Currency Transaction Reports with the Internal Revenue Service, as required under Title 31, United States Code, Section 5313(a) and the regulations issued thereunder, in connection with the payment, receipt, and transfer of sums of United States currency in excess of \$10,000, as set forth below:

Count	Date	Approximate Amount of Total Deposits	Financial Institution
TWO	September 28, 2005	\$13,700	Bayonne Community
THREE	November 7, 2005	\$13,000	North Fork
FOUR	December 20, 2005	\$11,100	North Fork

Count	Date	Approximate Amount of Total Deposits	Financial Institution
FIVE	April 4, 2006	\$13,000	Bayonne Community
SIX	May 1, 2006	\$13,200	Washington Mutual
SEVEN	May 3, 2006	\$11,000	Bayonne Community
EIGHT	May 8, 2006	\$12,650	Bayonne Community
NINE	May 9, 2006	\$13,000	Bayonne Community
TEN	May 12, 2006	\$11,200	Bayonne Community
ELEVEN	May 22, 2006	\$11,000	Bayonne Community
TWELVE	June 5, 2006	\$11,800	Bayonne Community
THIRTEEN	July 14, 2006	\$14,000	Bayonne Community
FOURTEEN	July 17, 2006	\$11,000	Bayonne Community
FIFTEEN	July 18, 2006	\$16,800	Bayonne Community
SIXTEEN	July 19, 2006	\$16,800	Bayonne Community
SEVENTEEN	July 20, 2006	\$16,800	Bayonne Community
EIGHTEEN	July 21, 2006	\$16,800	Bayonne Community
NINETEEN	July 24, 2006	\$16,600	Bayonne Community
TWENTY	July 25, 2006	\$23,500	Bayonne Community
TWENTY-ONE	July 26, 2006	\$18,000	Bayonne Community

Count	Date	Approximate Amount of Total Deposits	Financial Institution
TWENTY-TWO	July 28, 2006	\$28,500	Bayonne Community
TWENTY-THREE	July 31, 2006	\$23,600	Bayonne Community
TWENTY-FOUR	August 1, 2006	\$17,100	Bayonne Community
TWENTY-FIVE	August 3, 2006	\$33,000	Bayonne Community
TWENTY-SIX	August 4, 2006	\$20,600	Bayonne Community
TWENTY-SEVEN	August 7, 2006	\$40,100	Bayonne Community
TWENTY-EIGHT	August 8, 2006	\$21,900	Bayonne Community
TWENTY-NINE	August 9, 2006	\$39,630	Bayonne Community
THIRTY	August 10, 2006	\$22,800	Bayonne Community
THIRTY-ONE	August 11, 2006	\$29,400	Bayonne Community
THIRTY-TWO	August 14, 2006	\$30,700	Bayonne Community
THIRTY-THREE	August 15, 2006	\$25,000	Bayonne Community
THIRTY-FOUR	August 16, 2006	\$32,300	Bayonne Community
THIRTY-FIVE	August 17, 2006	\$26,800	Bayonne Community
THIRTY-SIX	August 18, 2006	\$33,000	Bayonne Community
THIRTY-SEVEN	August 21, 2006	\$16,900	Bayonne Community
THIRTY-EIGHT	August 21, 2006	\$16,600	Washington Mutual

Count	Date	Approximate Amount of Total Deposits	Financial Institution
THIRTY-NINE	August 22, 2006	\$27,200	Bayonne Community
FORTY	August 23, 2006	\$26,200	Bayonne Community
FORTY-ONE	August 24, 2006	\$13,500	Bayonne Community
FORTY-TWO	August 25, 2006	\$19,100	Bayonne Community
FORTY-THREE	August 28, 2006	\$20,000	Bayonne Community
FORTY-FOUR	August 29, 2006	\$22,000	Bayonne Community
FORTY-FIVE	August 30, 2006	\$34,500	Bayonne Community
FORTY-SIX	August 31, 2006	\$18,200	Bayonne Community
FORTY-SEVEN	September 1, 2006	\$28,800	Bayonne Community
FORTY-EIGHT	September 5, 2006	\$18,400	Bayonne Community
FORTY-NINE	September 6, 2006	\$38,800	Bayonne Community
FIFTY	September 7, 2006	\$24,700	Bayonne Community
FIFTY-ONE	September 8, 2006	\$17,900	Bayonne Community
FIFTY-TWO	September 11, 2006	\$11,500	Bayonne Community
FIFTY-THREE	September 11, 2006	\$10,700	Washington Mutual
FIFTY-FOUR	September 12, 2006	\$22,500	Bayonne Community

All in violation of Title 31, United States Code,
Sections 5324(a)(1) and (d)(1), and Title 18, United States Code,
Section 2.

A TRUE BILL,

FOREPERSON

CHRISTOPHER J. CHRISTIE
United States Attorney