1/10/11 5:15 pm

2010R01087/JMR/AJM

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Susan D. Wigenton
	:	
v.	:	10 Cr. 851
	:	
STEPHEN DEPIRO, a/k/a "Beach,"	:	18 U.S.C. §§ 2, 371, 894(a), 1084(a), 1951(a), 1955(a), 1962(d) and 1963
ALBERT CERNADAS, a/k/a "The Bull,"	:	
NUNZIO LAGRASSO,	:	
RICHARD DEHMER, a/k/a "Dickie,"	:	
EDWARD AULISI, a/k/a "Eddie,"	:	
VINCENT AULISI, a/k/a "The Vet,"	:	
THOMAS LEONARDIS, a/k/a "Tommy,"	:	
ROBERT RUIZ, a/k/a "Bobby,"	:	
MICHAEL TRUEBA, a/k/a "Mikey,"	:	
RAMIRO QUINTANS, a/k/a "Romo,"	:	
SALVATORE LAGRASSO,	:	
ANTHONY ALFANO, a/k/a "Brooklyn,"	:	
TONINO COLANTONIO, a/k/a "Tony,"	:	
JOHN HARTMANN, a/k/a "Lumpy," "Fatty" and "Fats," and	:	
GIUSEPPE PUGLIESE, a/k/a "Pepe"	:	

S U P E R S E D I N G I N D I C T M E N T

The Grand Jury charges:

INTRODUCTION

At all times relevant to this Superseding Indictment, unless otherwise indicated:

The Enterprise

1. The members and associates of the Genovese organized crime family of La Cosa Nostra constituted an "enterprise," as defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact (hereinafter, the "Genovese crime family" and "the enterprise"). The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The Genovese crime family engaged in, and its activities affected, interstate and foreign commerce. The Genovese crime family was an organized criminal group that operated in the District of New Jersey, the Eastern District of New York and elsewhere.

2. La Cosa Nostra operated through organized crime families. Five of these crime families - the Bonanno, Colombo, Gambino, Genovese and Luchese crime families - were headquartered in New York City, and supervised criminal activity in New York, in other areas of the United States and in some instances in other countries. Another crime family, the Decavalcante crime family, also existed, operating principally in New Jersey but from time to time also in New York City.

3. The ruling body of La Cosa Nostra, known as the "Commission," consisted of leaders from each of the crime families. The Commission convened from time to time to decide

certain issues affecting all of the crime families, such as rules governing crime family membership.

4. The Genovese crime family had a hierarchy and structure. The head of the Genovese crime family was known as the "boss." The Genovese crime family boss was assisted by an "underboss" and a counselor known as a "consigliere." Together, the boss, underboss and consigliere were the crime family's "administration." With the assistance of the underboss and consigliere, the boss was responsible for, among other things, setting policy and resolving disputes within and among La Cosa Nostra crime families and other criminal groups. The administration further supervised, supported, protected and disciplined the lower ranking participants in the crime family. In return for their supervision and protection, the administration received part of the illegal earnings generated by the crime family. Members of the Genovese crime family served in an "acting" rather than "official" capacity in the administration on occasion due to another administration member's incarceration or ill health, or for the purpose of seeking to insulate another administration member from law enforcement scrutiny. Further, on occasion, the Genovese crime family was overseen by a "panel" of crime family members that did not include the boss, underboss and/or consigliere.

5. Below the administration of the Genovese crime family were numerous "crews," also known as "regimes" and "decinas." Each crew was headed by a "captain," also known as a "skipper," "caporegime" and "capodecina." Each captain's crew consisted of "soldiers" and "associates." The captain was responsible for supervising the criminal activities of his crew and providing the crew with support and protection. In return, the captain often received a share of the crew's earnings.

6. Only members of the Genovese crime family could serve as a boss, underboss, consigliere, captain or soldier. Members of the Genovese crime family were referred to on occasion as "goodfellas" or "wiseguys," or as persons who had been "straightened out" or who had their "button." Associates were individuals who were not members of the Genovese crime family but who, nonetheless, engaged in criminal activity for, and under the protection of, the Genovese crime family.

7. Many requirements existed before an associate could become a member of the Genovese crime family. The Commission of La Cosa Nostra from time to time limited the number of new members that could be added to a crime family. An associate was also required to be proposed for membership by an existing crime family member. When the crime family's administration considered the associate worthy of membership, the administration then circulated the proposed associate's name on a list given to other La Cosa

Nostra crime families, which the other crime families reviewed and either approved or disapproved. Unless there was an objection to the associate's membership, the crime family then "inducted," or "straightened out," the associate as a member of the crime family in a secret ceremony. During the ceremony, the associate, among other things: swore allegiance for life to the crime family above all else, even the associate's own family; swore, on penalty of death, never to reveal the crime family's existence, criminal activities and other secrets; and swore to follow all orders issued by the crime family boss, including swearing to commit murder if the boss directed it.

Methods and Means of the Enterprise

8. The principal purpose of the Genovese crime family was to generate money for its members and associates. This purpose was implemented by members and associates of the Genovese crime family through various criminal activities, including fraud, extortion, illegal gambling and loansharking. The members and associates of the Genovese crime family also furthered the enterprise's criminal activities by threatening economic injury and using and threatening to use physical violence, including murder.

9. Although the primary purpose of the Genovese crime family was to generate money for its members and associates, the members and associates at times used the resources of the Genovese

crime family to settle personal grievances and vendettas, sometimes with the approval of higher ranking members of the family. For those purposes, members and associates of the enterprise were asked and expected to carry out, among other crimes, acts of violence, including murder and assault.

10. The members and associates of the Genovese crime family engaged in conduct designed to prevent government detection of their identities, their illegal activities and the location of proceeds of those activities. That conduct included a commitment to murdering persons, particularly members or associates of organized crime families, who were perceived as potential witnesses against members and associates of the enterprise.

11. Members and associates of the Genovese crime family often coordinated criminal activity with members and associates of other organized crime families.

12. At various times relevant to this Superseding Indictment, the defendant ALBERT CERNADAS was an associate of the Genovese crime family and the President of International Longshoremen's Association ("ILA") Local 1235. The defendant RICHARD DEHMER was an associate of the Genovese crime family. The defendant STEPHEN DEPIRO was a soldier and an associate within the Genovese crime family. The defendant NUNZIO LAGRASSO was an associate of the Genovese crime family and the Vice-President of ILA Local 1478.

COUNT ONE
(Racketeering Conspiracy)

13. The allegations of paragraphs one through 12 are realleged and incorporated as if fully set forth in this paragraph.

14. From at least in or about December 1982 through in or about January 2011, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, defendants

ALBERT CERNADAS,
RICHARD DEHMER,
STEPHEN DEPIRO, and
NUNZIO LAGRASSO,

together with others, being a person employed by and associated with the Genovese crime family, an enterprise that engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conspire to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5).

15. The pattern of racketeering activity through which the defendants

ALBERT CERNADAS,
RICHARD DEHMER,
STEPHEN DEPIRO, and
NUNZIO LAGRASSO,

together with others, agreed to conduct the affairs of the enterprise consisted of the racketeering acts set forth below in paragraphs 16 through 46 as Racketeering Acts One through Seventy-Three. The defendants agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

RACKETEERING ACT ONE
(Extortion Conspiracy)

16. It was a method and means of the extortion conspiracy that defendants STEPHEN DEPIRO, ALBERT CERNADAS and NUNZIO LAGRASSO extorted tribute payments of money from ILA port workers at or around Christmastime, the holiday period in which certain of those ILA union members received "container royalty fund" checks, a form of year-end compensation.

17. From at least in or about December 1982 to in and about January 2011, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

ALBERT CERNADAS,
STEPHEN DEPIRO, and
NUNZIO LAGRASSO

together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendants and their co-conspirators agreed to obtain property of ILA union members, that is: money belonging to ILA union members, with their consent, which consent was to be induced by wrongful use of actual

and threatened force, violence and fear, in violation of Title 18, United States Code, Section 1951(a).

RACKETEERING ACTS TWO THROUGH TWENTY-FIVE
(Extortion)

18. The defendant ALBERT CERNADAS, together with others, agreed to the commission of the following acts of extortion, either one of which alone, whether in violation of federal or state law, constitutes the Racketeering Act alleged:

A. Extortion

19. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ALBERT CERNADAS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #1, an individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #1, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear, in violation of Title 18, United States Code, Sections 1951(a) and 2:

B. Theft by Extortion

20. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ALBERT CERNADAS,

together with others, did purposely and unlawfully obtain property of another by extortion, in that the defendant and his co-conspirators obtained property of John Doe #1, that is: money belonging to John Doe #1, by purposely threatening to inflict harm which would not substantially benefit the defendant ALBERT CERNADAS and his co-conspirators but which was calculated to materially harm John Doe #1, in violation of New Jersey Statute 2C:20-5(g):

Date	Victim	Racketeering Act
December 1982 - January 1983	John Doe #1	2
December 1983 - January 1984	John Doe #1	3
December 1984 - January 1985	John Doe #1	4
December 1985 - January 1986	John Doe #1	5
December 1986 - January 1987	John Doe #1	6
December 1987 - January 1988	John Doe #1	7
December 1988 - January 1989	John Doe #1	8
December 1989 - January 1990	John Doe #1	9
December 1990 - January 1991	John Doe #1	10
December 1991 - January 1992	John Doe #1	11
December 1992 - January 1993	John Doe #1	12

Date	Victim	Racketeering Act
December 1993 - January 1994	John Doe #1	13
December 1994 - January 1995	John Doe #1	14
December 1995 - January 1996	John Doe #1	15
December 1996 - January 1997	John Doe #1	16
December 1997 - January 1998	John Doe #1	17
December 1998 - January 1999	John Doe #1	18
December 1999 - January 2000	John Doe #1	19
December 2000 - January 2001	John Doe #1	20
December 2001 - January 2002	John Doe #1	21
December 2002 - January 2003	John Doe #1	22
December 2003 - January 2004	John Doe #1	23
December 2004 - January 2005	John Doe #1	24
December 2005 - January 2006	John Doe #1	25

RACKETEERING ACTS TWENTY-SIX THROUGH THIRTY-THREE
(Extortion)

21. The defendant ALBERT CERNADAS, together with others, agreed to the commission of the following acts of extortion, either one of which alone, whether in violation of federal or state law, constitutes the Racketeering Act alleged:

A. Extortion

22. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ALBERT CERNADAS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #2, an individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #2, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear, in violation of Title 18, United States Code, Sections 1951(a) and 2:

B. Theft by Extortion

23. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ALBERT CERNADAS,

together with others, did purposely and unlawfully obtain property of another by extortion, in that the defendant and his co-conspirators obtained property of John Doe #2, that is: money belonging to John Doe #2, by purposely threatening to inflict harm which would not substantially benefit the defendant ALBERT CERNADAS and his co-conspirators but which was calculated to materially harm John Doe #2, in violation of New Jersey Statute 2C:20-5(g):

Date	Victim	Racketeering Act
December 1997 - January 1998	John Doe #2	26
December 1998 - January 1999	John Doe #2	27
December 2000 - January 2001	John Doe #2	28
December 2001 - January 2002	John Doe #2	29
December 2002 - January 2003	John Doe #2	30
December 2003 - January 2004	John Doe #2	31
December 2004 - January 2005	John Doe #2	32
December 2005 - January 2006	John Doe #2	33

RACKETEERING ACTS THIRTY-FOUR THROUGH FORTY-THREE
(Extortion)

24. The defendant NUNZIO LAGRASSO, together with others, agreed to the commission of the following acts of extortion, either one of which alone, whether in violation of federal or state law, constitutes the Racketeering Act alleged:

A. Extortion

25. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #3, an individual whose identity is known to the grand jury, that is:

money belonging to John Doe #3, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear, in violation of Title 18, United States Code, Sections 1951(a) and 2:

B. Theft by Extortion

26. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did purposely and unlawfully obtain property of another by extortion, in that the defendant and his co-conspirators obtained property of John Doe #3, that is: money belonging to John Doe #3, by purposely threatening to inflict harm which would not substantially benefit the defendant NUNZIO LAGRASSO and his co-conspirators but which was calculated to materially harm John Doe #3, in violation of New Jersey Statute 2C:20-5(g):

Date	Victim	Racketeering Act
December 2000 - January 2001	John Doe #3	34
December 2001 - January 2002	John Doe #3	35
December 2002 - January 2003	John Doe #3	36
December 2003 - January 2004	John Doe #3	37
December 2004 - January 2005	John Doe #3	38
December 2005 - January 2006	John Doe #3	39

Date	Victim	Racketeering Act
December 2006 - January 2007	John Doe #3	40
December 2007 - January 2008	John Doe #3	41
December 2008 - January 2009	John Doe #3	42
December 2009 - January 2010	John Doe #3	43

RACKETEERING ACTS FORTY-FOUR THROUGH SIXTY-FIVE
(Extortion)

27. The defendant NUNZIO LAGRASSO, together with others, agreed to the commission of the following acts of extortion, either one of which alone, whether in violation of federal or state law, constitutes the Racketeering Act alleged:

A. Extortion

28. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #4, an individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #4, with his consent, which consent was induced by wrongful use of actual and threatened force,

violence and fear, in violation of Title 18, United States Code, Sections 1951(a) and 2:

B. Theft by Extortion

29. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did purposely and unlawfully obtain property of another by extortion, in that the defendant and his co-conspirators obtained property of John Doe #4, that is: money belonging to John Doe #4, by purposely threatening to inflict harm which would not substantially benefit the defendant NUNZIO LAGRASSO and his co-conspirators but which was calculated to materially harm John Doe #4, in violation of New Jersey Statute 2C:20-5(g):

Date	Victim	Racketeering Act
December 1989 - January 1990	John Doe #4	44
December 1990 - January 1991	John Doe #4	45
December 1991 - January 1992	John Doe #4	46
December 1992 - January 1993	John Doe #4	47
December 1993 - January 1994	John Doe #4	48
December 1994 - January 1995	John Doe #4	49
December 1995 - January 1996	John Doe #4	50
December 1996 - January 1997	John Doe #4	51
December 1997 - January 1998	John Doe #4	52

Date	Victim	Racketeering Act
December 1998 - January 1999	John Doe #4	53
December 1999 - January 2000	John Doe #4	54
December 2000 - January 2001	John Doe #4	55
December 2001 - January 2002	John Doe #4	56
December 2002 - January 2003	John Doe #4	57
December 2003 - January 2004	John Doe #4	58
December 2004 - January 2005	John Doe #4	59
December 2005 - January 2006	John Doe #4	60
December 2006 - January 2007	John Doe #4	61
December 2007 - January 2008	John Doe #4	62
December 2008 - January 2009	John Doe #4	63
December 2009 - January 2010	John Doe #4	64

RACKETEERING ACTS SIXTY-FIVE THROUGH SEVENTY
(Extortion)

30. The defendant NUNZIO LAGRASSO, together with others, agreed to the commission of the following acts of extortion, either one of which alone, whether in violation of federal or state law, constitutes the Racketeering Act alleged:

A. Extortion

31. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #5, an individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #5, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear, in violation of Title 18, United States Code, Sections 1951(a) and 2:

B. Theft by Extortion

32. From at least in or about and through the dates alleged below, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did purposely and unlawfully obtain property of another by extortion, in that the defendant and his co-conspirators obtained property of John Doe #5, that is: money belonging to John Doe #5, by purposely threatening to inflict harm which would not substantially benefit the defendant NUNZIO LAGRASSO and his co-conspirators but which was calculated to materially harm John Doe #5, in violation of New Jersey Statute 2C:20-5(g):

Date	Victim	Racketeering Act
December 2004 - January 2005	John Doe #5	65
December 2005 - January 2006	John Doe #5	66
December 2006 - January 2007	John Doe #5	67
December 2007 - January 2008	John Doe #5	68
December 2008 - January 2009	John Doe #5	69
December 2009 - January 2010	John Doe #5	70

RACKETEERING ACT SEVENTY-ONE
(Illegal Gambling - Sports Betting)

33. The defendants RICHARD DEHMER and STEPHEN DEPIRO, together with others, agreed to the commission of the following acts, any one of which alone constitutes Racketeering Act Seventy-One:

A. Illegal Gambling Business

34. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

RICHARD DEHMER and
STEPHEN DEPIRO,

together with others, did knowingly and intentionally conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, that is: a gambling business involving bookmaking, which operated in violation of the laws of New Jersey, that is: New Jersey Statute 2C:37-2, which involved five or more persons who conducted, financed, managed, supervised, directed and

owned all or part of such business and which remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of at least $2,000 in any single day, in violation of Title 18, United States Code, Sections 1955(a) and 2.

B. Promoting Gambling

35. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

RICHARD DEHMER and
STEPHEN DEPIRO,

together with others, did knowingly and intentionally engage in conduct which materially aided a form of gambling activity, that is: bookmaking, involving the receipt and acceptance of three or more bets in any two week period, in violation of New Jersey Statute 2C:37-2.

C. Transmission of Wagering Information

36. On or about August 11, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the

placing of bets and wagers on a sporting event and contest, in violation of Title 18, United States Code, Section 1084(a).

D. Transmission of Wagering Information

37. On or about November 10, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest, in violation of Title 18, United States Code, Section 1084(a).

E. Transmission of Wagering Information

38. On or about November 16, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest, in violation of Title 18, United States Code, Section 1084(a).

F. Transmission of Wagering Information

39. On or about November 25, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest, in violation of Title 18, United States Code, Section 1084(a).

G. Transmission of Wagering Information

40. On or about December 14, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest, in violation of Title 18, United States Code, Section 1084(a).

H. Transmission of Wagering Information

41. On or about December 21, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest, in violation of Title 18, United States Code, Section 1084(a).

I. Transmission of Wagering Information

42. On or about January 18, 2010, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest, in violation of Title 18, United States Code, Section 1084(a).

RACKETEERING ACT SEVENTY-TWO
(Extortionate Collection of Credit Conspiracy/
Extortionate Collection of Credit)

43. The defendants RICHARD DEHMER and STEPHEN DEPIRO, together with others, agreed to the commission of one or more of the following acts, either one of which alone constitutes Racketeering Act Seventy-Two:

A. Extortionate Collection of Credit Conspiracy

44. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

RICHARD DEHMER and
STEPHEN DEPIRO,

together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect and attempt to collect extensions of credit from bettors engaged in DEHMER and DEPIRO's bookmaking operation, in violation of Title 18, United States Code, Section 894(a)(1).

B. Extortionate Collection of Credit

45. From at least in or about October 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect extensions of credit from John Doe #12, an individual whose identity is known to the Grand Jury, in violation of Title 18, United States Code, Sections 894(a)(1) and 2.

RACKETEERING ACT SEVENTY-THREE
(Illegal Gambling - Poker)

46. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, did knowingly and intentionally conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, that is: a gambling business involving poker, which operated in violation of the laws of New Jersey, that is: New Jersey Statute 2C:37-2, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of such business and which remained in substantially continuous operation for a period in excess of thirty days, in violation of Title 18, United States Code, Sections 1955(a) and 2.

All in violation of Title 18, United States Code, Sections 1962(d) and 1963.

COUNT TWO

(Collection of Unlawful Debt Racketeering Conspiracy)

47. The allegations of paragraphs one through 15 and 33 through 46 are realleged and incorporated as if fully set forth in this paragraph.

48. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

RICHARD DEHMER and STEPHEN DEPIRO,

together with others, being persons employed by and associated with the Genovese crime family, an enterprise that engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conspire to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through the collection of unlawful debt, as that term is defined in Title 18, United States Code, Section 1961(6), that is: debts that were incurred in gambling activity which was in violation of federal law, that is: Title 18, United States Code, Section 1955, and New Jersey State law, that is: New Jersey Statute 2C:37-2, and were incurred in connection with the business of gambling, in violation of federal law and New Jersey State law.

In violation of Title 18, United States Code, Section 1962(d).

COUNT THREE
(Extortion Conspiracy)

49. From at least in or about December 1982 to in and about January 2011, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

EDWARD AULISI,
VINCENT AULISI,
ALBERT CERNADAS,
STEPHEN DEPIRO,
NUNZIO LAGRASSO,
SALVATORE LAGRASSO,
THOMAS LEONARDIS,
RAMIRO QUINTANS,
ROBERT RUIZ, and
MICHAEL TRUEBA,

together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators agreed to obtain property of ILA union members, that is: money belonging to ILA union members, with their consent, which consent was to be induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT FOUR
(Extortion)

50. From at least in or about December 2005 to in and about January 2006, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ALBERT CERNADAS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #1, that is: money belonging to John Doe #1, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT FIVE
(Extortion)

51. From at least in or about December 2006 to in and about January 2007, both dates being approximate and inclusive, in the District of New Jersey, the defendant

VINCENT AULISI,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #1, that is: money belonging to John Doe #1, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT SIX
(Extortion)

52. From at least in or about December 2007 to in and about January 2008, both dates being approximate and inclusive, in the District of New Jersey, the defendant

VINCENT AULISI,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #1, that is: money belonging to John Doe #1, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT SEVEN
(Extortion)

53. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ROBERT RUIZ,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #1, that is: money belonging to John Doe #1, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT EIGHT
(Extortion)

54. From at least in or about December 2009 to in and about January 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ROBERT RUIZ,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #1, that is: money belonging to John Doe #1, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT NINE
(Extortion)

55. From at least in or about December 2005 to in and about January 2006, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ALBERT CERNADAS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #2, that is: money belonging to John Doe #2, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TEN
(Extortion)

56. From at least in or about December 2006 to in and about January 2007, both dates being approximate and inclusive, in the District of New Jersey, the defendant

VINCENT AULISI,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #2, that is: money belonging to John Doe #2, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT ELEVEN
(Extortion)

57. From at least in or about December 2007 to in and about January 2008, both dates being approximate and inclusive, in the District of New Jersey, the defendant

VINCENT AULISI,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #2, that is: money belonging to John Doe #2, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWELVE
(Extortion)

58. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ROBERT RUIZ,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #2, that is: money belonging to John Doe #2, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTEEN
(Extortion)

59. From at least in or about December 2009 to in and about January 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

ROBERT RUIZ,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #2, that is: money belonging to John Doe #2, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT FOURTEEN
(Extortion)

60. From at least in or about December 2006 to in and about January 2007, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #3, that is: money belonging to John Doe #3, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT FIFTEEN
(Extortion)

61. From at least in or about December 2007 to in and about January 2008, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #3, that is: money belonging to John Doe #3, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT SIXTEEN
(Extortion)

62. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #3, that is: money belonging to John Doe #3, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT SEVENTEEN
(Extortion)

63. From at least in or about December 2009 to in and about January 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #3, that is: money belonging to John Doe #3, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT EIGHTEEN
(Extortion)

64. From at least in or about December 2006 to in and about January 2007, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #4, that is: money belonging to John Doe #4, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT NINETEEN
(Extortion)

65. From at least in or about December 2007 to in and about January 2008, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #4, that is: money belonging to John Doe #4, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY
(Extortion)

66. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #4, that is: money belonging to John Doe #4, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY-ONE
(Extortion)

67. From at least in or about December 2009 to in and about January 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #4, that is: money belonging to John Doe #4, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY-TWO
(Extortion)

68. From at least in or about December 2006 to in and about January 2007, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #5, that is: money belonging to John Doe #5, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY-THREE
(Extortion)

69. From at least in or about December 2007 to in and about January 2008, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #5, that is: money belonging to John Doe #5, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY-FOUR
(Extortion)

70. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #5, that is: money belonging to John Doe #5, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY-FIVE
(Extortion)

71. From at least in or about December 2009 to in and about January 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

NUNZIO LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #5, that is: money belonging to John Doe #5, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY-SIX
(Extortion)

72. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendant

RAMIRO QUINTANS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #6, an individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #6, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY-SEVEN
(Extortion)

73. From at least in or about December 2009 to in and about January 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

SALVATORE LAGRASSO,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #6, that is: money belonging to John Doe #6, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY-EIGHT
(Extortion)

74. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendant

RAMIRO QUINTANS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #7, an individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #7, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT TWENTY-NINE
(Extortion)

75. From at least in or about December 2009 to in and about January 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

RAMIRO QUINTANS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #7, that is: money belonging to John Doe #7, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY
(Extortion)

76. From at least in or about December 2007 to in and about January 2008, both dates being approximate and inclusive, in the District of New Jersey, the defendant

MICHAEL TRUEBA,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #8, an individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #8, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY-ONE
(Extortion)

77. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendants

THOMAS LEONARDIS and
MICHAEL TRUEBA,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #8, that is: money belonging to John Doe #8, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY-TWO
(Extortion)

78. From at least in or about December 2009 to in and about March 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

THOMAS LEONARDIS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #8, that is: money belonging to John Doe #8, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY-THREE
(Extortion)

79. From at least in or about December 2006 to in and about January 2007, both dates being approximate and inclusive, in the District of New Jersey, the defendant

MICHAEL TRUEBA,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #9, an individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #9, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY-FOUR
(Extortion)

80. From at least in or about December 2007 to in and about January 2008, both dates being approximate and inclusive, in the District of New Jersey, the defendant

MICHAEL TRUEBA,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #9, that is: money belonging to John Doe #9, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY-FIVE
(Extortion)

81. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendant

MICHAEL TRUEBA,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #9, that is: money belonging to John Doe #9, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY-SIX
(Extortion)

82. From at least in or about December 2009 to in and about January 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

MICHAEL TRUEBA,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #9, that is: money belonging to John Doe #9, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY-SEVEN
(Extortion)

83. From at least in or about December 2007 to in and about January 2008, both dates being approximate and inclusive, in the District of New Jersey, the defendant

MICHAEL TRUEBA,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #10, and individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #10, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY-EIGHT
(Extortion)

84. From at least in or about December 2007 to in and about January 2008, both dates being approximate and inclusive, in the District of New Jersey, the defendant

RAMIRO QUINTANS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #11, and individual whose identity is known to the Grand Jury, that is: money belonging to John Doe #11, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT THIRTY-NINE
(Extortion)

85. From at least in or about December 2008 to in and about January 2009, both dates being approximate and inclusive, in the District of New Jersey, the defendant

RAMIRO QUINTANS,

together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators obtained property of John Doe #11, that is: money belonging to John Doe #11, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT FORTY
(Attempted Extortion)

86. From at least in or about December 2009 to in and about January 2010, both dates being approximate and inclusive, in the District of New Jersey, the defendant

RAMIRO QUINTANS,

together with others, did knowingly and intentionally attempt to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators attempted to obtain property of John Doe #11, that is: money belonging to John Doe #11, with his consent, which consent was induced by wrongful use of actual and threatened force, violence and fear.

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

COUNT FORTY-ONE
(Illegal Gambling Conspiracy - Bookmaking)

87. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

RICHARD DEHMER,
STEPHEN DEPIRO, and
JOHN HARTMANN,

together with others, did knowingly and intentionally conspire to conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, that is: a gambling business involving bookmaking, which operated in violation of the laws of New Jersey, that is: New Jersey Statute 2C:37-2, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of such business and which remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of at least $2,000 in any single day, in violation of Title 18, United States Code, Sections 1955(a).

In furtherance of the conspiracy and to effect its objectives, in the District of New Jersey and elsewhere, the defendants RICHARD DEHMER, STEPHEN DEPIRO and JOHN HARTMANN, together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

a. On or about July 14, 2009, at approximately 7:39 p.m., the defendant RICHARD DEHMER called a sports betting operator.

b. On or about July 17, 2009, at approximately 9:09 p.m., the defendant STEPHEN DEPIRO had a telephone conversation over the defendant RICHARD DEHMER's cellular telephone.

c. On or about August 3, 2009, at approximately 10:04 a.m., the defendants RICHARD DEHMER and STEPHEN DEPIRO had a telephone conversation.

d. On or about August 11, 2009, at approximately 1:42 p.m., the defendant RICHARD DEHMER called a sports betting operator.

e. On or about August 23, 2009, at approximately 10:50 a.m., the defendants RICHARD DEHMER and JOHN HARTMANN had a telephone conversation.

f. On or about September 21, 2009, at approximately 7:18 p.m., the defendants RICHARD DEHMER and JOHN HARTMANN had a telephone conversation.

g. On or about October 10, 2009, at approximately 2:33 p.m., the defendants RICHARD DEHMER and STEPHEN DEPIRO had a telephone conversation.

h. On or about October 10, 2009, at approximately 2:34 p.m., the defendants RICHARD DEHMER and JOHN HARTMANN had a telephone conversation.

i. On or about November 10, 2009, at approximately 12:50 p.m., the defendant RICHARD DEHMER called a sports betting operator.

j. On or about November 16, 2009, at approximately 12:37 p.m., the defendant RICHARD DEHMER called a sports betting operator.

k. On or about November 22, 2009, at approximately 9:56 a.m., the defendants RICHARD DEHMER and JOHN HARTMANN had a telephone conversation.

l. On or about November 25, 2009, at approximately 12:20 p.m., the defendant RICHARD DEHMER called a sports betting operator.

m. On or about November 25, 2009, at approximately 4:36 p.m., the defendant STEPHEN DEPIRO called a sports betting operator.

n. On or about December 6, 2009, at approximately 8:34 a.m., the defendants RICHARD DEHMER and JOHN HARTMANN had a telephone conversation.

o. On or about December 14, 2009, at approximately 7:33 p.m., the defendant RICHARD DEHMER called a sports betting operator.

p. On or about December 21, 2009, at approximately 3:21 p.m., the defendant RICHARD DEHMER called a sports betting operator.

q. On or about January 18, 2010, at approximately 1:07 p.m., the defendant RICHARD DEHMER called a sports betting operator.

r. On or about January 26, 2010, the defendants RICHARD DEHMER and STEPHEN DEPIRO met at a restaurant in New Jersey.

In violation of Title 18, United States Code, Section 371.

COUNT FORTY-TWO
(Illegal Gambling - Bookmaking)

88. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

RICHARD DEHMER,
STEPHEN DEPIRO, and
JOHN HARTMANN,

together with others, did knowingly and intentionally conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, that is: a gambling business involving bookmaking, which operated in violation of the laws of New Jersey, that is: New Jersey Statute 2C:37-2, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of such business and which remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of at least $2,000 in any single day.

In violation of Title 18, United States Code, Sections 1955(a) and 2.

COUNT FORTY-THREE
(Extortionate Collection of Credit Conspiracy)

89. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

RICHARD DEHMER and
STEPHEN DEPIRO,

together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect and attempt to collect extensions of credit from bettors engaged in DEHMER and DEPIRO's bookmaking operation.

In violation of Title 18, United States Code, Section 894(a)(1).

COUNT FORTY-FOUR
(Extortionate Collection of Credit)

90. From at least in or about October 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect extensions of credit from John Doe #12.

In violation of Title 18, United States Code, Section 894(a)(1) and 2.

COUNT FORTY-FIVE
(Transmission of Wagering Information)

91. On or about August 11, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest.

In violation of Title 18, United States Code, Section 1084(a).

COUNT FORTY-SIX
(Transmission of Wagering Information)

92. On or about November 10, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest.

In violation of Title 18, United States Code, Section 1084(a).

COUNT FORTY-SEVEN
(Transmission of Wagering Information)

93. On or about November 16, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest.

In violation of Title 18, United States Code, Section 1084(a).

COUNT FORTY-EIGHT
(Transmission of Wagering Information)

94. On or about November 25, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest.

In violation of Title 18, United States Code, Section 1084(a).

COUNT FORTY-NINE
(Transmission of Wagering Information)

95. On or about December 14, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest.

In violation of Title 18, United States Code, Section 1084(a).

COUNT FIFTY
(Transmission of Wagering Information)

96. On or about December 21, 2009, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest.

In violation of Title 18, United States Code, Section 1084(a).

COUNT FIFTY-ONE
(Transmission of Wagering Information)

97. On or about January 18, 2010, in the District of New Jersey and elsewhere, the defendant

RICHARD DEHMER,

together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of bets and wagers on a sporting event and contest.

In violation of Title 18, United States Code, Section 1084(a).

COUNT FIFTY-TWO
(Illegal Gambling Conspiracy - Poker)

98. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

ANTHONY ALFANO,
TONINO COLANTONIO,
RICHARD DEHMER, and
GIUSEPPE PUGLIESE,

together with others, did knowingly and intentionally conspire to conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, that is: a gambling business involving poker, which operated in violation of the laws of New Jersey, that is: New Jersey Statute 2C:37-2, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of such business and which remained in substantially continuous operation for a period in excess of thirty days, in violation of Title 18, United States Code, Sections 1955(a).

99. In furtherance of the conspiracy and to effect its objectives, in the District of New Jersey and elsewhere, the defendants ANTHONY ALFANO, TONINO COLANTONIO, RICHARD DEHMER, and GIUSEPPE PUGLIESE, together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

a. On or about August 12, 2009, at approximately 7:45 a.m., the defendants TONINO COLANTONIO and RICHARD DEHMER had a telephone conversation.

b. On or about September 11, 2009, at approximately 5:05 p.m., the defendants TONINO COLANTONIO and RICHARD DEHMER had a telephone conversation.

c. On or about October 7, 2009, at approximately 9:15 p.m., the defendant RICHARD DEHMER had a telephone conversation with a coconspirator.

d. On or about November 8, 2009, at approximately 3:19 p.m., the defendants ANTHONY ALFANO and RICHARD DEHMER had a telephone conversation.

e. On or about December 17, 2009, at approximately 3:20 p.m., the defendants RICHARD DEHMER and GIUSEPPE PUGLIESE had a telephone conversation.

f. On or about January 6, 2010, at approximately 11:58 a.m., the defendants RICHARD DEHMER and GIUSEPPE PUGLIESE had a telephone conversation.

g. On or about January 18, 2010, at approximately 7:14 p.m., the defendants ANTHONY ALFANO and RICHARD DEHMER had a telephone conversation.

h. On or about January 19, 2010, at approximately 4:28 p.m., the defendants TONINO COLANTONIO and RICHARD DEHMER had a telephone conversation.

In violation of Title 18, United States Code, Section 371.

COUNT FIFTY-THREE
(Illegal Gambling - Poker)

100. From at least in or about July 2009 to in or about January 2010, both dates being approximate and inclusive, in the District of New Jersey and elsewhere, the defendants

ANTHONY ALFANO,
TONINO COLANTONIO,
RICHARD DEHMER, and
GIUSEPPE PUGLIESE,

together with others, did knowingly and intentionally conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, that is: a gambling business involving poker, which operated in violation of the laws of New Jersey, that is: New Jersey Statute 2C:37-2, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of such business and which remained in substantially continuous operation for a period in excess of thirty days.

In violation of Title 18, United States Code, Sections 1955(a) and 2.

A TRUE BILL

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FOREPERSON

PAUL J. FISHMAN
United States Attorney