
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

v. : Mag. No. 11-3109

JAMES F. SODANO, SR.
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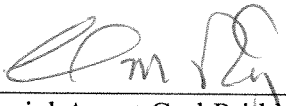
I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. On or about May 19, 2011 in Essex County, in the District of New Jersey and elsewhere, Defendant JAMES F. SODANO, SR., and others known and unknown:

SEE ATTACHMENT A

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 B

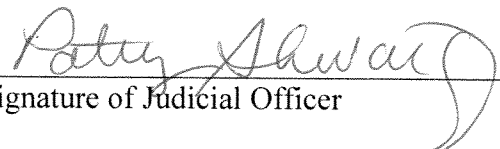
continued on the attached page and made a part hereof.



Special Agent Carl Priddy
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
July 8, 2011 at Newark, New Jersey

HONORABLE PATTY SHWARTZ
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT 1

did knowingly and willfully conspire with others to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by robbery, and to commit and threaten physical violence to persons and property in furtherance thereof.

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

COUNT 2

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is the violation of 18 U.S.C. § 1951(a) charged in Court 1 of this Complaint, did knowingly use and carry a firearm, and possess a firearm in furtherance of such crime, which firearm was discharged, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

ATTACHMENT B

I, Carl Priddy, a Special Agent with the Federal Bureau of Investigation ("FBI"), following an investigation, am aware of the following facts. Any events described to have occurred on a certain date occurred on or about that date:

1. On May 19, 2011, a retired police officer ("VICTIM"), was working as an armed money courier for a check cashing service, C&F Check Cashing Services ("C&F"), located at 17 Avenue A, Newark, New Jersey. On that day, VICTIM was engaged to deliver a bag containing \$400,000.00 to a bar, ESCORIAL, located at 129-131 Elm Street, Newark, New Jersey.

2. At approximately 10:15 am on May 19, 2011, as VICTIM exited his vehicle and approached ESCORIAL, VICTIM was confronted and robbed by two armed men, one of whom was later identified as Defendant James F. Sodano, Sr. ("SODANO"), and a second, as yet unidentified co-conspirator ("CO-CONSPIRATOR 1").

3. As a result of the armed robbery, VICTIM was unable to complete the delivery of cash to ESCORIAL, which he was hired to accomplish.

4. During the robbery, VICTIM was shot multiple times and sustained injuries to his face, arm and back.

5. SODANO fled the scene of the robbery and attempted to drive away in a getaway car. CO-CONSPIRATOR 1 fled the scene on foot.

6. SODANO was arrested on May 19, 2011 after attempting to flee the scene of the armed robbery. The car he was driving away from the scene of the crime was found to contain a bag containing the \$400,000.00 VICTIM was hired to deliver to ESCORIAL on May 19, 2011.

7. SODANO and CO-CONSPIRATOR 1 conspired to obtain money and other things of value by force from the employee(s) of businesses engaged in commerce (as that term is defined in 18 U.S.C. § 1951(b)(3)).

8. It was part of the conspiracy that on or about May 19, 2011, Defendant SODANO and CO-CONSPIRATOR 1 used handguns to rob VICTIM, who was employed as an armed courier for C&F.

9. At all times material to this Complaint, C&F was a commercial establishment located at 17 Avenue A, Newark, New Jersey, engaged in transactions involving checks and currency that moved and were transferred in interstate and foreign commerce.

10. At all times material to this Complaint, ESCORIAL was a commercial establishment located at 129-131 Elm Street, Newark, New Jersey, engaged in selling food, alcoholic beverages, and other items that moved and were transferred in interstate and foreign commerce.

11. During the commission of the armed robbery, which was an object of their conspiracy, both Defendant SODANO and CO-CONSPIRATOR 1 discharged handguns, causing serious bodily harm to VICTIM.