

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

- - - - -X
UNITED STATES OF AMERICA

v.

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,
GREGORY RICHARDSON,
JOSEPH WILLIAM NAPOLITANO,
also known as "Billy Nap,"
RUSSELL FALLACARA,
JOHN YESWITA,
JOSEPH BRUNO,
JOHN DENNIS,
JOHN GRECCO,
MICHAEL BORELLI,
also known as "Tona,"
PETER GRECCO,
LUDWIG BRUSCHI,
also known as "Ninny"
ALEX CONIGLIARO,
STEVE PASTORE, and
NICHOLAS LADAGONA,
also known as
"Nicky the Snake",

Defendants.

Crim. No.

18 U.S.C. §§ 1962(c) and(d),
1955, 1952, 1951, 1001,
894, 892, 659, and 2.

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

COUNT 1
(Racketeering Conspiracy)

The Enterprise

1. At all times material to the allegations contained in this Indictment:

a. The Genovese Crime Family of La Cosa Nostra (the "Genovese Crime Family" or "the Family") was a wholly illegal organization, operating in the District of New Jersey, and elsewhere in the United States, which constituted an "enterprise" as that term is defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact as an enterprise, which was engaged in, and the activities of which affected, interstate commerce.

b. "La Cosa Nostra," also known as the "mafia" or "this thing of ours", was a nationwide criminal organization which operated through entities, including the Genovese Crime Family, as well as four other New York-based families, to wit, the Bonanno, Colombo, Gambino, and Luchese organized crime families. La Cosa Nostra also included other crime families based in geographic areas, including the DeCalvacante organized crime family, which principally operated in New Jersey and the Bruno/Scarfo or Philadelphia organized crime family, which principally operated in the Philadelphia area of Pennsylvania and Southern New Jersey.

c. The Genovese Crime Family was a structured criminal enterprise with a well-defined chain of command. At the top of the Family hierarchy was the "boss." Below the "boss" was an "underboss" who acted as the second in command, and a "consigliere," or advisor.

d. Beneath these three highest-ranking members of the Genovese Crime Family were the "captains," known as "caporegimes," "capos," or "skippers." Each captain supervised and controlled the activities of one or more groups or "crews" of individual "soldiers" or members of the Family who had been formally initiated or "made" as members of the enterprise. The soldiers in turn recruited and controlled the activities of various associates, each of whom functioned in a subordinate capacity and sought the protection and economic benefits to be derived from such an association and, in some instances, ultimate elevation into the ranks of "made" members. From time to time, members of the Genovese Family were temporarily appointed to the positions of boss, underboss, consigliere or captain, and functioned in an "acting" capacity for incarcerated or temporarily incapacitated members of the Genovese Crime Family.

e. From the 1980's through the date of the filing of this Indictment, the boss of the Genovese Crime Family was Vincent Gigante, also known as "Chin." In 1997, Gigante was convicted of racketeering and related offenses and began serving a prison term later that same year. Although Gigante remained the boss of the Genovese Crime Family, responsibility for the day-to-day leadership of the Genovese Crime Family passed to a committee of members of the Genovese Crime Family, also known as the "Administration."

f. With the approval of Genovese Crime Family boss Vincent Gigante, the Administration was responsible for setting

policy for the Genovese Crime Family, resolving disputes between members of the Family and members of other criminal organizations, and approving all significant actions by members of the Genovese Crime Family. The Administration supervised, supported, protected, and disciplined the captains, soldiers and associates and regularly received reports regarding the criminal activities of members and associates of the Genovese Crime Family.

g. The Genovese Crime Family constituted an ongoing organization, whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The principal purpose of the Genovese 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, but not limited to, loansharking, illegal gambling, extortion, and the collection of unlawful debt. Among the methods and means by which the members and associates of the enterprise furthered its criminal activities were the threatened and actual use of violence.

h. The Genovese Crime Family asserted its control over members and associates through a system of loyalty, protocol, and internal discipline. Each level of the Family was responsible for advising the next higher level of proposed criminal activity. Those higher levels in turn decided whether to sanction the criminal activity of those below them. Those higher levels also resolved disputes arising among lower level members and their associates and assisted in resolving disputes with members of

other crime families. Violation of this duty of loyalty, or a failure to abide by the chain of command, or rules of protocol, or a failure to share profits when required, or interference with the operation of the enterprise could result in serious disciplinary action, including bodily harm.

The Defendants

2. At various times material to the charges in this Indictment:

a. Defendant LAWRENCE DENTICO, also known as the "Little Guy" and "Little Larry," was a captain or soldier within the Genovese Crime Family and a member of the Genovese Crime Family Administration. In that capacity, LAWRENCE DENTICO shared ultimate authority concerning the management and supervision of the Genovese Crime Family's criminal activities, including illegal gambling, loansharking, and extortion.

b. Defendant JOSEPH SCARBROUGH, also known as "Big Joe," was a high-level associate in the Genovese Crime Family. JOSEPH SCARBROUGH was in charge of and directed the various criminal activities of a group of associates or crew of the Family, which activities were conducted from, among other locations, a social club located at 404 Madison Avenue, Hoboken, New Jersey. Those criminal activities included loansharking, illegal gambling (sports bookmaking, numbers, and football tickets), and extortion. JOSEPH SCARBROUGH reported to LAWRENCE DENTICO.

c. Defendant MICHAEL CRINCOLI was a made member of the Genovese Crime Family and was in charge of and directed the loansharking activities of a group of associates or crew of the Family, which activities were conducted from, among other locations, MICHAEL CRINCOLI's store located at 944 Westside Avenue, Jersey City, New Jersey. MICHAEL CRINCOLI reported to LAWRENCE DENTICO.

d. Defendant GREGORY RICHARDSON was an associate of the Genovese Crime Family and part of the crew headed by MICHAEL CRINCOLI. GREGORY RICHARDSON was involved in the collection of extortionate extensions of credit and the collection of unlawful debt. GREGORY RICHARDSON also acted as a conduit for relaying messages to LAWRENCE DENTICO.

e. Defendant JOSEPH WILLIAM NAPOLITANO, also known as "Billy Nap," was an associate of the Genovese Crime Family and part of the crew headed by JOSEPH SCARBROUGH. JOSEPH WILLIAM NAPOLITANO was involved in the sports bookmaking operation, the football ticket operation, the making of extortionate extensions of credit, and the collection of unlawful debt.

f. Defendant RUSSELL FALLACARA was an associate of the Genovese Crime Family and part of the crew headed by JOSEPH SCARBROUGH. RUSSELL FALLACARA was involved in the sports bookmaking operation, football ticket operation, and the collection of unlawful debt. RUSSELL FALLACARA was also involved in extortion on behalf of the enterprise, which criminal activity

was facilitated by his position as an inspector with the Jersey City Incinerator Authority.

g. Defendant JOHN YESWITA was an associate of the Genovese Crime Family and part of the crew headed by JOSEPH SCARBROUGH. JOHN YESWITA was responsible for overseeing the operation of the crew's sports bookmaking operation. JOHN YESWITA was also involved in the illegal numbers operation, football ticket operation, and the collection of unlawful debt.

h. Defendant JOSEPH BRUNO was an associate of the Genovese Crime Family and part of the crew headed by JOSEPH SCARBROUGH. JOSEPH BRUNO was involved with JOHN YESWITA in the crew's sports bookmaking operation and numbers operation and the collection of unlawful debt.

i. Defendant JOHN DENNIS was an associate of the Genovese Crime Family and part of the crew headed by MICHAEL CRINCOLI. JOHN DENNIS was involved in the collection of extortionate extensions of credit and the collection of unlawful debt.

j. Defendant JOHN GRECCO was an associate of the Genovese Crime Family. JOHN GRECCO was involved in the illegal numbers operation concerning which he reported to his brother PETER GRECCO and MICHAEL BORELLI, who are not charged in Count One but are charged elsewhere in this Indictment and were associated with the Genovese Crime Family. JOHN GRECCO was also involved in the football ticket operation.

k. The enterprise also utilized the services of the following individuals, who are not charged in Count One but are charged elsewhere in this Indictment, to facilitate its criminal activities:

i. Defendant LUDWIG BRUSCHI, also known as "NINNY," was associated with the Genovese Crime Family and was involved in the operation of the illegal numbers operation.

ii. Defendant ALEX CONIGLIARO was associated with the Genovese Crime Family and was involved in the illegal numbers operation concerning which he reported to LUDWIG BRUSCHI.

iii. Defendant STEVE PASTORE was associated with the Genovese Crime Family and was involved in the illegal numbers operation concerning which he reported to his cousin ALEX CONIGLIARO and LUDWIG BRUSCHI.

iv. Defendant NICHOLAS LADAGONA was associated with the Genovese Crime Family and was involved in the making of extortionate extensions of credit.

3. From at least as early as 1997 through in or about the date of this Indictment, in the District of New Jersey and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,
GREGORY RICHARDSON,
JOSEPH WILLIAM NAPOLITANO,
also known as "Billy Nap,"
RUSSELL FALLACARA,
JOHN YESWITA,
JOSEPH BRUNO,

JOHN DENNIS,
JOHN GRECCO

and others, being persons employed by and associated with an enterprise, that is, the Genovese Crime Family, which was engaged in, and the activities of which affected, interstate commerce, did knowingly and willfully conspire with each other and with others to conduct and to participate, directly and indirectly, in the conduct of the affairs of the Genovese Crime Family, through a pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and (5), as set forth more particularly in Paragraphs 7 and 8 below, and through the collection of unlawful debts as defined in Title 18, United States Code, Section 1961(6), as set forth more particularly in Paragraphs 9 and 10 below.

Manner and Means

Among the manner and means by which the defendants and others conducted and participated in the conduct of the affairs of the Genovese Crime Family enterprise were the following:

4. To generate income for the enterprise, the defendants and others would and did engage in money-making criminal activities, including the following:

Illegal Gambling

a. The defendants and others operated an illegal gambling business involving sports bookmaking and engaged in the collection of gambling debts incurred in connection therewith. As part of the sports bookmaking operation, the defendants worked as, and employed others to work as, sitters at various locations in

New York City, New York and Philadelphia, Pennsylvania at which telephone lines had been installed for the purpose of accepting bets placed by individual bettors and agents, who handled and were responsible for a group of bettors. The defendants routinely kept records of the individual bets to insure their accuracy and to minimize any disputes with bettors/agents concerning wins and losses. The defendants would personally meet with, and direct others to meet with, bettors/agents for the purpose of settling up gambling debts.

b. The defendants and others operated an illegal numbers operation and engaged in the collection of unlawful debts in connection therewith. As part of the numbers operation, the defendants maintained locations in Jersey City, New Jersey where the numbers bets would be placed, betting forms reviewed, and a calculation of the prior day's gambling wins and losses, also referred to as a "ribbon," would be generated. In addition, the defendants maintained locations in Staten Island, New York, and Philadelphia, Pennsylvania where they would, among other things, store records of the numbers operation and calculate ribbons.

c. The defendants and others operated an illegal football ticket operation and engaged in the collection of unlawful debts in connection therewith. During the college and professional football season, thousands of football tickets would be delivered each week to the Downtown Pub, in Jersey City, New Jersey. The defendants and others would pick up the tickets from

the Downtown Pub and distribute them to agents and individual bettors in New Jersey.

Loansharking

d. The defendants and others made unlawful loans and extensions of credit and collected those loans and extensions of credit using the enterprise's violent reputation, threats of violence, and actual violence, to force victims, many of whom were business owners in the Greek community, to repay loans and extensions of credit and to pay interest at usurious rates.

Extortion

e. The defendants and others used threats, including the threat of economic harm, in their efforts to obtain money from a business engaged in a site cleanup in Jersey City, New Jersey.

5. To perpetuate the enterprise the defendants and others would and did attempt to conceal from law enforcement authorities the existence of the enterprise, the identity of its members and associates, the ways in which it conducted its affairs, and the decisions and orders given by the leaders to others working for the enterprise. The methods used to conceal criminal activities from law enforcement included the use of coded language, aliases, and counter surveillance techniques, and the restriction of criminal conversations to locales the defendants believed were safe from law enforcement scrutiny.

6. To compensate the leadership of the enterprise, the defendants and others would and did distribute part of the income

from illegal activities to the leadership of the enterprise, sometimes referred to as tribute payments.

Pattern of Racketeering

7. It was part of the racketeering conspiracy that each defendant agreed that at least two acts of racketeering activity would be committed by a conspirator in the conduct of the affairs of the enterprise.

8. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following Racketeering Acts:

Racketeering Act One: [same as Count 4]

Illegal Gambling Business-Sports Bookmaking Operation

From at least as early as 1997 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants LAWRENCE DENTICO, also known as "Little Guy" and "Little Larry," JOSEPH SCARBROUGH, also known as "Big Joe," JOSEPH WILLIAM NAPOLITANO, also known as "Billy Nap," RUSSELL FALLACARA, JOHN YESWITA, JOSEPH BRUNO, and others did knowingly and willfully conduct, finance, manage, supervise, direct all and part of an illegal gambling business, that is, a sports bookmaking operation, which (i) was a violation of the laws of the States of New Jersey, New York, and Pennsylvania, and (ii) involved five or more persons who conducted, financed, managed, supervised, directed, and owned all and part of such business, and (iii) was in substantially

continuous operation for a period in excess of thirty days and had gross revenue of more than \$2,000 in any single day, contrary to Title 18, United States Code, Sections 1955 and 2.

Racketeering Act Two:
[same as Count 5]

Illegal Gambling Business-Numbers Operation

From at least as early as 1997 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants LAWRENCE DENTICO, also known as "Little Guy" and "Little Larry," JOSEPH SCARBROUGH, also known as "Big Joe," JOHN YESWITA, JOHN GRECCO, JOSEPH BRUNO, and others did knowingly and willfully conduct, finance, manage, supervise, direct and own all and part of an illegal gambling business, that is, a numbers operation, which (i) was a violation of the laws of the States of New Jersey, New York, and Pennsylvania, and (ii) involved five or more persons who conducted, financed, managed, supervised, directed, and owned all and part of such business, and (iii) was in substantially continuous operation for a period in excess of thirty days and had gross revenue of more than \$2,000 in any single day, contrary to Title 18, United States Code, Sections 1955 and 2.

Racketeering Act Three:
[same as Count 6]

Illegal Gambling Business-Football Ticket Operation

From at least as early as September 2002 through November 2003, in the District of New Jersey, and elsewhere, the

defendants JOSEPH SCARBROUGH, also known as "Big Joe," JOHN YESWITA, RUSSELL FALLACARA, JOSEPH WILLIAM NAPOLITANO, also known as "Billy Nap," JOHN GRECCO, and others did knowingly and willfully conduct, finance, manage, supervise, direct and own all and part of an illegal gambling business, that is, a football ticket operation, which (i) was a violation of the laws of the State of New Jersey, and (ii) involved five or more persons who conducted, financed, managed, supervised, directed, and owned all and part of such business, and (iii) was in substantially continuous operation for a period in excess of thirty days and had gross revenue of more than \$2,000 in any single day, contrary to Title 18, United States Code, Sections 1955 and 2.

Racketeering Act Four:

Loan Sharking Conspiracy

Each defendant named below committed the following acts, either one of which alone constitutes the commission of Racketeering Act Four as to that defendant:

(a) Conspiracy to Make Extortionate Loans
[same as Count 7]

From at least as early as 2001 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants LAWRENCE DENTICO, also known as "Little Guy" and "Little Larry," JOSEPH SCARBROUGH, also known as "Big Joe," MICHAEL CRINCOLI, and JOSEPH WILLIAM NAPOLITANO, also known as "Billy Nap," did knowingly and willfully conspire with each other and with others to make extortionate extensions of credit, as defined in Title 18, United States Code, Section 891, to various

individuals, contrary to Title 18, United States Code, Section 892.

(b) Conspiracy to Collect Extortionate Loans
[same as Count 8]

From at least as early as 2001 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants LAWRENCE DENTICO, also known as "Little Guy" and "Little Larry," JOSEPH SCARBROUGH, also known as "Big Joe," MICHAEL CRINCOLI, GREGORY RICHARDSON, and JOHN DENNIS did knowingly and willfully conspire with each other and with others to participate in the use of extortionate means, that is, means involving the use of express and implicit threats of violence, to collect and attempt to collect from various individuals extensions of credit, as defined in Title 18, United States Code, Section 891, and to punish such individuals for the non-repayment thereof, contrary to Title 18, United States Code, Section 894.

Racketeering Acts Five through Nine:

Loansharking Transactions

On or about the dates indicated below, in the District of New Jersey, and elsewhere, the defendants indicated below knowingly and willfully made extortionate extensions of credit, contrary to Title 18, United States Code, Sections 892 and 2, as specified below, or knowingly participated in the use of extortionate means to collect and attempt to collect extensions of credit, and to punish the non-repayment thereof, contrary to Title 18, United States Code, Sections 894 and 2, as specified below,

involving the individual victims indicated below whose identities are known to the grand jury:

<u>Racketeering Act</u>	<u>Date</u>	<u>Defendants</u>	<u>Victim</u>	<u>Title U.S.C. §</u>
5 [Count 9]	2002-2003	L. DENTICO J. SCARBROUGH M. CRINCOLI	G.V.	892
6 [Count 10]	2002-2003	L. DENTICO J. SCARBROUGH M. CRINCOLI	T.D.	892
7 [Count 11]	2003-Ind.	L. DENTICO J. SCARBROUGH M. CRINCOLI G. RICHARDSON J. DENNIS	G.V.	894
8 [Count 12]	2003-Ind.	L. DENTICO J. SCARBROUGH M. CRINCOLI G. RICHARDSON J. DENNIS	T.D.	894
9 [Count 13]	2003	L. DENTICO J. SCARBROUGH M. CRINCOLI	T.T.	894

Racketeering Act Ten

The defendants JOSEPH SCARBROUGH and RUSSELL FALLACARA committed the following acts, either one of which alone constitutes the commission of Racketeering Act Ten as to that defendant:

(a) Extortion Conspiracy
[same as Count 14]

From in or about June 2002 through December 2004, in the District of New Jersey, and elsewhere, the defendants JOSEPH SCARBROUGH, RUSSELL FALLACARA, and others, knowingly and willfully conspired to obstruct, delay, and affect commerce and the movement

of an article and commodity in commerce by extortion, by agreeing to obtain the property of a business whose identity is known to the grand jury, with the consent of its principal, induced by the wrongful use of actual and threatened force, violence, and fear, including the fear of economic harm, contrary to Title 18, United States Code, Section 1951.

(b) Attempted Extortion
[same as Count 15]

From in or about June 2002 through December 2004, in the District of New Jersey, and elsewhere, the defendants JOSEPH SCARBROUGH, RUSSELL FALLACARA, and others, knowingly and willfully attempted to obstruct, delay, and affect commerce and the movement of an article and commodity in commerce by extortion, by obtaining and attempting to obtain the property of a business whose identity is known to the grand jury, with the consent of its principal, induced by the wrongful use of actual and threatened force, violence and fear, including the fear of economic harm, contrary to Title 18, United States Code, Sections 1951 and 2.

Collection of Unlawful Debt

9. It was further part of the racketeering conspiracy that each defendant agreed to the collection of an unlawful debt in the conduct of the affairs of the enterprise, that is a debt that was (a) incurred and contracted in gambling activity which was in violation of the laws of the United States, New Jersey, New York, and Pennsylvania, and which was incurred in connection with the business of gambling in violation of the laws of the United

States, New Jersey, New York, and Pennsylvania; and (b) that was unenforceable under the laws of New Jersey, in whole, and in part, as to principal and interest because of the laws relating to usury, and which was incurred in connection with the business of lending money and anything of value at rates that were usurious, in that they were greater than permitted under the laws of New Jersey, and where the usurious rates were at least twice the enforceable rate.

10. In particular, in conducting the affairs of the enterprise, the defendants named herein, and others, agreed to the collection of the unlawful debts listed below:

<u>Unlawful Debt No.</u>	<u>Date</u>	<u>Defendants</u>	<u>Victim</u>	<u>Type</u>
1	2002- Ind.	L. DENTICO J. SCARBROUGH M. CRINCOLI G. RICHARDSON J. DENNIS	G.V.	Usurious Loan

<u>Unlawful Debt No.</u>	<u>Date</u>	<u>Defendants</u>	<u>Victim</u>	<u>Type</u>
2	2002- Ind.	L. DENTICO J. SCARBROUGH G. RICHARDSON J. DENNIS	T.D.	Usurious Loan
3	2003	L. DENTICO J. SCARBROUGH M. CRINCOLI	T.T.	Usurious Loan
4	2002- 2004	J. YESWITA	M.R.	Usurious Loan
5	3/03- 6/03	J. SCARBROUGH	S.S.	Usurious Loan
6	10/02-	J. YESWITA	D.L.	Gambling

6/03

7	1997 - 1999	R. FALLACARA J. NAPOLITANO	A.S.	Gambling
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In violation of Title 18, United States Code, Section
1962(d).

COUNT 2

(Racketeering - Pattern of Racketeering Activity)

11. Paragraphs 1, 2, 4-6, and 8 of this Indictment are
realleged and incorporated as though set forth in full herein.

12. Continuously from at least as early as 1997 through
in or about the date of this Indictment, in the District of New
Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,

GREGORY RICHARDSON,
JOSEPH WILLIAM NAPOLITANO,
also known as "Billy Nap,"
RUSSELL FALLACARA,
JOHN YESWITA,
JOSEPH BRUNO,
JOHN DENNIS,
JOHN GRECCO,

and others, being persons employed by and associated with the enterprise herein, that is, the Genovese Crime Family, which was engaged in, and the activities of which affected, interstate commerce, did knowingly and willfully conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), and as set forth in Racketeering Acts One through Ten of Count One of this Indictment.

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

COUNT 3

(Racketeering - Collection of Unlawful Debt)

13. Paragraphs 1, 2, 4-6, 9, and 10 of this Indictment are realleged and incorporated as though fully set forth herein.

14. From in or about 2002 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,
GREGORY RICHARDSON,

JOHN DENNIS,
JOHN YESWITA

and others, being persons employed by and associated with the enterprise herein, that is, the Genovese Crime Family, which enterprise was engaged in, and the activities of which affected, interstate commerce, did knowingly and willfully conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through the collection of an unlawful debt, as defined in Title 18, United States Code, Section 1961(6), and as set forth as unlawful debts numbered 1 through 6 in Paragraph 10 in Count One of this Indictment.

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

COUNT 4

(Illegal Gambling Business - Sports Bookmaking)
[same as Racketeering Act One]

15. From at least as early as 1997 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
JOSEPH WILLIAM NAPOLITANO,
also known as "Billy Nap,"
RUSSELL FALLACARA,
JOHN YESWITA,
JOSEPH BRUNO,

and others did knowingly and willfully conduct, finance, manage, supervise, direct and own all and part of an illegal gambling business, that is, a sports bookmaking operation, which (i) was a violation of the laws of the States of New Jersey, New York, and Pennsylvania and (ii) involved five or more persons who conducted, financed, managed, supervised, directed, and owned all and part of such business, and (iii) was in substantially continuous operation for a period in excess of thirty days and had gross revenue of more than \$2,000 in any single day.

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

COUNT 5

(Illegal Gambling Business - Numbers Operation)
[same as Racketeering Act Two]

16. From at least as early as 1997 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
JOHN YESWITA,
JOSEPH BRUNO,
JOHN GRECCO,
MICHAEL BORELLI,
also known as "Tona,"
PETER GRECCO,

LUDWIG BRUSCHI,
also known as "Ninny,"
ALEX CONIGLIARO,
STEVE PASTORE

and others did knowingly and willfully conduct, finance, manage, supervise, direct and own all and part of an illegal gambling business, that is, a numbers operation, which (i) was a violation of the laws of the States of New Jersey, New York, and Pennsylvania, and (ii) involved five or more persons who conducted, financed, managed, supervised, directed, and owned all and part of such business, and (iii) was in substantially continuous operation for a period in excess of thirty days and had gross revenue of more than \$2,000 in any single day.

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

COUNT 6

(Illegal Gambling Business - Football Ticket Operation)
[same as Racketeering Act Three]

17. From at least as early as the fall of 2002 through November 2003, in the District of New Jersey, and elsewhere, the defendants

JOSEPH SCARBROUGH,
also known as "Big Joe,"
JOSEPH WILLIAM NAPOLITANO,
also known as "Billy Nap,"
RUSSELL FALLACARA,
JOHN YESWITA,
JOHN GRECCO,

and others did knowingly and willfully conduct, finance, manage, supervise, direct and own all and part of an illegal gambling

business, that is, a football ticket operation, which (i) was a violation of the laws of the State of New Jersey, and (ii) involved five or more persons who conducted, financed, managed, supervised, directed, and owned all and part of such business, and (iii) was in substantially continuous operation for a period in excess of thirty days and had gross revenue of more than \$2,000 in any single day.

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

COUNT 7

(Conspiracy to Make Extortionate Extensions of Credit)
[same as Racketeering Act Four(a)]

18. From at least as early as 2001 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,
JOSEPH WILLIAM NAPOLITANO,
also known as "Billy Nap," and
NICHOLAS LADAGONA,
also known as "Nicky the Snake"

did knowingly and willfully conspire with each other and with others to make extortionate extensions of credit, as defined in Title 18, United States Code, Section 891, to various individuals.

In violation of Title 18, United States Code, Section 892.

COUNT 8

(Conspiracy to Collect by Extortionate Means)
[same as Racketeering Act Four(b)]

19. From at least as early as 2001 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,
GREGORY RICHARDSON, and
JOHN DENNIS

did knowingly and willfully conspire with each other and with others to participate in the use of extortionate means, that is,

means involving the use of express and implicit threats of violence, to collect from various individuals extensions of credit, as defined in Title 18, United States Code, Section 891, and to punish such individuals for the non-repayment thereof.

In violation of Title 18, United States Code, Section 894.

COUNT 9

(Making an Extortionate Extension of Credit to G.V.)
[same as Racketeering Act Five]

20. From in or about 2002 through in or about 2003, in the District of New Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,

and others did knowingly and willfully make an extortionate extension of credit, in an amount of approximately \$40,000, as defined in Title 18, United States Code, Section 891, to G.V.

In violation of Title 18, United States Code, Sections 892 and 2.

COUNT 10

(Making an Extortionate Extension of Credit to T.D.)
[same as Racketeering Act Six]

21. In or about February, 2003, in the District of New Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Litte Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,
MICHAEL CRINCOLI,

and others did knowingly and willfully make an extortionate extension of credit, in an amount of approximately \$50,000, as defined in Title 18, United States Code, Section 891, to T.D.

In violation of Title 18, United States Code, Sections 892 and 2.

COUNT 11

(Collection by Extortionate Means from G.V.)
[same as Racketeering Act Seven]

22. From in or about 2003 through in or about the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,
GREGORY RICHARDSON,
JOHN DENNIS

and others, did knowingly and willfully participate in the use of extortionate means, that is, means involving the use of express and implicit threats of violence, to collect and attempt to collect from G.V. an extension of credit, as defined in Title 18,

United States Code, Section 891, and to punish G.V. for the non-repayment thereof.

In violation of Title 18, United States Code, Sections 894 and 2.

COUNT 12

(Collection by Extortionate Means from T.D.
[same as Racketeering Act Eight]

23. In or about 2002 through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,
GREGORY RICHARDSON,
JOHN DENNIS,

and others, did knowingly and willfully participate in the use of extortionate means, that is, means involving the use of express and implicit threats of violence, to collect and attempt to collect from T.D. an extension of credit, as defined in Title 18,

United States Code, Section 891, and to punish T.D. for the non-repayment thereof.

In violation of Title 18, United States Code, Sections 894 and 2.

COUNT 13

(Collection by Extortionate Means from T.T.)
[same as Racketeering Act Nine]

24. In or about September 2003, in the District of New Jersey and the Southern District of New York, and elsewhere, the defendants

LAWRENCE DENTICO,
also known as "Little Guy"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"
MICHAEL CRINCOLI,

and others, did knowingly and willfully participate in the use of extortionate means, that is, means involving the use of express and implicit threats of violence, to collect and attempt to collect from T.T. an extension of credit, as defined in Title 18,

United States Code, Section 891, and to punish T.T. for the non-repayment thereof.

In violation of Title 18, United States Code, Sections 894 and 2.

COUNT 14

(Conspiracy to Commit Extortion)
[same as Racketeering Act Ten(a)]

25. From in or about June 2002 through December 2004, in the District of New Jersey, and elsewhere, the defendants

JOSEPH SCARBROUGH,
also known as "Big Joe,"
RUSSELL FALLACARA,

and others, knowingly and willfully conspired to obstruct, delay, and affect commerce and the movement of an article and commodity in commerce by extortion, by agreeing to obtain the property of a business whose identity is known to the grand jury, with the consent of its principal, induced by the wrongful use of actual and threatened force, violence and fear, including the fear of economic harm.

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

COUNT 15

(Attempted Extortion)
[same as Racketeering Act Ten(b)]

26. From in or about June 2002 through December 2004,
in the District of New Jersey, and elsewhere, the defendants

JOSEPH SCARBROUGH,
also known as "Big Joe,"
RUSSELL FALLACARA,

and others, knowingly and willfully attempted to obstruct, delay,
and affect commerce and the movement of an article and commodity
in commerce by extortion, by obtaining and attempting to obtain
the property of a business whose identity is known to the grand
jury, with the consent of its principal, induced by the wrongful
use of actual and threatened force, violence and fear, including
the fear of economic harm.

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

COUNT 16

(Receipt and Possession of Goods Stolen From Interstate Shipment)

27. On or about February 16, 2004, in the District of New Jersey, and elsewhere, the defendant

NICHOLAS LADAGONA,
also known as "Nicky the Snake"

did knowingly and willfully have in his possession, goods and chattels having a value in excess of \$1,000, that is 162 Bill Blass suits, which had been embezzled, stolen, carried away, concealed, and obtained by fraud and deception from Florida Direct Express, which goods and chattels were moving in interstate commerce from Secaucus, New Jersey to Philadelphia, Pennsylvania, knowing the said goods and chattels to have been embezzled and stolen.

In violation of Title 18, United States Code, Sections 659 and 2.

COUNT 17

(Interstate Travel in Aid of Racketeering)

28. On or about December 20, 2002, in the District of New Jersey, and elsewhere, the defendant

JOHN YESWITA

did knowingly and willfully travel from New Jersey to Pennsylvania with the intent to promote, manage, establish, and carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity that is, a business enterprise involving gambling, in violation of Title 18, United States Code, Section 1955 and the laws of New Jersey, New York, and Pennsylvania, and thereafter did perform, attempt to perform, and cause the performance of an act to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of the above stated unlawful activity, that is a

business enterprise involving gambling, in that the defendant traveled to meet a high-ranking member of the Philadelphia Crime Family of La Cosa Nostra for the purpose of making a tribute payment.

In violation of Title 18, United States Code, Sections 1952 and 2.

COUNT 18

(Interstate Travel in Aid of Racketeering)

29. On or about September 9, 2003, in the District of New Jersey, and elsewhere, the defendants

JOSEPH SCARBROUGH,
also known as "Big Joe," and
MICHAEL CRINCOLI,

did knowingly and willfully travel from New Jersey to New York with the intent to promote, manage, establish, and carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity that is, the obtaining of property from T.T. by extortion, in violation of Title 18, United States Code, Section 1951, and thereafter did perform, attempt to perform, and cause the performance of an act to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of the above stated unlawful activity, that is the

obtaining of property from T.T. by extortion, including the use of physical force.

In violation of Title 18, United States Code, Sections 1952 and 2.

COUNT 19

(False or Fraudulent Statement)

30. On or about January 20, 2004, in the District of New Jersey, and elsewhere, in a matter within the jurisdiction of the Federal Bureau of Investigation within the Department of Justice, an agency of the United States, the defendant

JOHN YESWITA,

knowingly and willfully made and caused to be made a false, fictitious, and fraudulent material statement and representation, in that the defendant submitted a notarized letter in connection with an administrative forfeiture proceeding in which he asserted that \$35,000 of the \$56,780 seized from his residence during the execution of a search warrant was not subject to administrative forfeiture because it belonged to his aunt, when in fact this money belonged to defendant JOHN YESWITA.

In violation of Title 18, United States Code, Section 1001(a)(2).

FIRST FORFEITURE ALLEGATION

31. The allegations in Counts One, Two, and Three are hereby repeated, realleged, and incorporated by reference herein as though fully set forth for the purpose of alleging forfeiture, pursuant to the provisions of Title 18, United States Code, Section 1963. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to each defendant listed in Paragraph 32 below that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1962 in the event of that defendant's conviction under Counts One, Two, or Three of this Indictment.

32. The defendants

LAWRENCE DENTICO,
also known as "Little Guy,"
and "Little Larry,"
JOSEPH SCARBROUGH,
also known as "Big Joe,"

MICHAEL CRINCOLI,
JOSEPH WILLIAM NAPOLITANO,
also known as "Billy Nap," and
JOHN YESWITA

i. have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 1963(a)(1); and

ii. have property constituting and derived from proceeds which they obtained, directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States of America pursuant to Title 18, United States Code, Section 1963(a)(3).

33. The interests of the defendants subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 1963(a)(1) and (3) include but are not limited to at least five million dollars (\$5,000,000).

34. If any of the property described in paragraphs 32 and 33 above, as a result of any act of omission of a defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third party;

(3) has been placed beyond the jurisdiction of the court; or

(4) has been commingled with other property which cannot be divided without difficulty;

the Court shall order the forfeiture of any other property of the defendants up to the value of any property set forth in paragraphs 32 and 33 above pursuant to Title 18, United States Code, Section 1963(m).

35. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 1963.

SECOND FORFEITURE ALLEGATION

36. The allegations in Count Five are hereby repeated, realleged, and incorporated by reference herein as though fully set forth for the purpose of alleging forfeiture, pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C) and 1955(d) and Title 28, United States Code, Section 2461(c).

37. From their engagement in the violation alleged in Count Five of this Indictment, punishable by imprisonment for more than one year, the defendants

MICHAEL BORELLI,
also known as "Tona," and
PETER GRECCO,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all of their right, title, and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to the said violation and pursuant to Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461(c) any property, including money, used in violation of the provisions of this section, including but not limited to the following:

A sum of money equal to \$550,000 in United States currency, representing the amount of proceeds obtained as a result of the offense, for which the defendants are jointly and severally liable.

38. If any of the property described in Paragraph 37 above, as a result of any act of omission of a defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third party;

(3) has been placed beyond the jurisdiction of the court; or

(4) has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

CHRISTOPHER J. CHRISTIE
UNITED STATES ATTORNEY

