

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x
: UNITED STATES OF AMERICA :
: :
: INFORMATION
: -v- :
: S4 11 Cr. 12 (RMB)
: VINCENZO FROGIERO, :
: a/k/a "Vinny Carwash," :
: :
- - - - -x

COUNT ONE

The United States Attorney charges:

1. In or about 2006, in the Southern District of New York and elsewhere, VINCENZO FROGIERO, a/k/a "Vinny Carwash," the defendant, being in the business of betting and wagering, willfully and knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on a sporting event and content, and for the transmission of a wire communication which did entitle the recipient to receive money and credit as a result of bets and wagers, and for information assisting in the placing of bets and wagers, to wit, FROGIERO participated in a gambling business in furtherance of which FROGIERO and others made interstate wire communications.

(Title 18, United States Code, Sections 1084 and 2.)

COUNT TWO

The United States Attorney further charges:

2. In or about 2007, in the Southern District of New York and elsewhere, VINCENZO FROGIERO, a/k/a "Vinny Carwash," the defendant, being in the business of betting and wagering, willfully and knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on a sporting event and content, and for the transmission of a wire communication which did entitle the recipient to receive money and credit as a result of bets and wagers, and for information assisting in the placing of bets and wagers, to wit, FROGIERO participated in a gambling business in furtherance of which FROGIERO and others made interstate wire communications.

(Title 18, United States Code, Sections 1084 and 2.)

COUNT THREE

The United States Attorney further charges:

3. In or about 2008, in the Southern District of New York and elsewhere, VINCENZO FROGIERO, a/k/a "Vinny Carwash," the defendant, being in the business of betting and wagering, willfully and knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on a sporting event and content, and for the transmission

of a wire communication which did entitle the recipient to receive money and credit as a result of bets and wagers, and for information assisting in the placing of bets and wagers, to wit, FROGIERO participated in a gambling business in furtherance of which FROGIERO and others made interstate wire communications.

(Title 18, United States Code, Sections 1084 and 2.)

COUNT FOUR

The United States Attorney further charges:

4. In or about 2009, in the Southern District of New York and elsewhere, VINCENZO FROGIERO, a/k/a "Vinny Carwash," the defendant, being in the business of betting and wagering, willfully and knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on a sporting event and content, and for the transmission of a wire communication which did entitle the recipient to receive money and credit as a result of bets and wagers, and for information assisting in the placing of bets and wagers, to wit, FROGIERO participated in a gambling business in furtherance of which FROGIERO and others made interstate wire communications.

(Title 18, United States Code, Sections 1084 and 2.)

COUNT FIVE

The United States Attorney further charges:

5. In or about 2010, in the Southern District of New York and elsewhere, VINCENZO FROGIERO, a/k/a "Vinny Carwash," the defendant, being in the business of betting and wagering, willfully and knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on a sporting event and content, and for the transmission of a wire communication which did entitle the recipient to receive money and credit as a result of bets and wagers, and for information assisting in the placing of bets and wagers, to wit, FROGIERO participated in a gambling business in furtherance of which FROGIERO and others made interstate wire communications.

(Title 18, United States Code, Sections 1084 and 2.)

Forfeiture Allegation

6. As a result of committing the offenses in violation of Title 18, United States Code, Sections 1084 and 2, as alleged in Counts One, Two, Three, Four, and Five of this Information, defendant VINCENZO FROGIERO, a/k/a "Vinny Carwash," shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the gambling offense, all property,

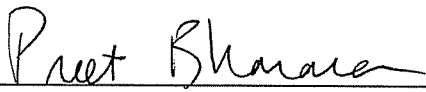
including money, used in the commission of the gambling offense, including \$50,000 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the gambling offense, and property used in the commission of the gambling offense.

Substitute Asset Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value;
- or
- e. has been commingled with other property which cannot be subdivided without difficulty;
- it is the intent of the United States, pursuant to 21 U.S.C. §

853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 1084; Title 28, United States Code, Section 2461).



PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

VINCENZO FROGIERO,
a/k/a "Vinny Carwash,"

Defendant.

INFORMATION

S4 11 Cr. 12 (RMB)

(Title 18, United States Code, Sections 981, 1084 and 2; Title
28, United States Code, Section 2461.)

PREET BHARARA
United States Attorney.
