

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF RHODE ISLAND

FILED
MAR 01 2008
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)

v.)

Criminal No.: 11-0049

015

Violations:

✓ LUIGI MANOCCHIO, a/k/a "Louie",)
a/k/a "Baby Shacks", a/k/a "The Professor",)
a/k/a "The Old Man,")
THOMAS IAFRATE, a/k/a "Tommy",)
THEODORE CARDILLO, a/k/a "Teddy",)
RICHARD BONAFIGLIA)

18 U.S.C. § 1962(d)
18 U.S.C. § 1951(a)
18 U.S.C. § 1963

Defendants.)

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE
(RICO Conspiracy)

The Enterprise

At all times relevant to this Indictment, unless otherwise stated:

1. The members and associates of the New England organized crime family of La Cosa Nostra (the "New England LCN", or "NELCN"), 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 (hereinafter also referenced as "the Enterprise"). The NELCN was engaged in, and its activities affected, interstate and foreign commerce. The NELCN constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)

Criminal No.: 11-0046)

v.)

Violations:)

LUIGI MANOCCHIO, a/k/a "Louie",)
a/k/a "Baby Shacks", a/k/a "The Professor",)
a/k/a "The Old Man,")
THOMAS IAFRATE, a/k/a "Tommy",)
THEODORE CARDILLO, a/k/a "Teddy",)
RICHARD BONAFIGLIA)

18 U.S.C. § 1962(d)
18 U.S.C. § 1951(a)
18 U.S.C. § 1963

Defendants.)

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE
(RICO Conspiracy)

The Enterprise

At all times relevant to this Indictment, unless otherwise stated:

1. The members and associates of the New England organized crime family of La Cosa Nostra (the "New England LCN", or "NELCN"), 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 (hereinafter also referenced as "the Enterprise"). The NELCN was engaged in, and its activities affected, interstate and foreign commerce. The NELCN constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

2. The NELCN was a criminal organization engaged in extortion, loan sharking, gambling, and other crimes. The NELCN operated in the City of Providence, within the District of Rhode Island, and elsewhere.

3. The head of the NELCN was known as the "Boss", whose leadership was to be respected by all members and associates. The Boss supervised, supported, protected and disciplined members and associates of the NELCN, and regularly received reports regarding the activities of the members and associates of the NELCN. The Boss was also responsible for resolving any disputes among members and associates of the NELCN, and for approving all significant actions taken by members and associates of the NELCN. He was often assisted by an "Underboss" and "Capos" who shared in the leadership responsibilities of the Enterprise. When a Boss, Underboss or Capo was unable to fulfil their responsibilities because of incarceration, or other reason, a member of the NELCN was appointed to that position in an acting capacity.

4. The NELCN was operated through smaller groups, sometimes known as "crews", based in Rhode Island and elsewhere. These crews of the NELCN generally consisted of members and associates who participated in the activities of the NELCN, performed necessary and helpful roles in the criminal endeavors of the NELCN, and served as insulation from criminal exposure for the hierarchy of the Enterprise.

5. The NELCN enterprise frequently used intimidation and fear to induce owners and operators of certain adult bookstores and topless nightclubs, or "strip clubs" in Providence, Rhode Island (hereinafter also referenced collectively as "adult entertainment businesses") to provide monthly "protection" payments in cash, and to exert and preserve the NELCN's control over these businesses, and otherwise promote the purposes of the NELCN enterprise.

Purposes of the Enterprise

6. The purposes of the Enterprise included the following:
 - a. Enriching the leaders, members, and associates of the Enterprise through various criminal activities, including extortion;
 - b. Preserving and protecting the power, control and revenue of the Enterprise through intimidation and threats of force and violence;
 - c. Promoting and enhancing the Enterprise and its members' and associates' activities;
 - d. Keeping victims in fear of the Enterprise, and in fear of its members and associates, through direct and indirect threats of force and violence;
 - e. Engaging in conduct designed to prevent government detection of their illegal activities and the proceeds of those activities.

The Defendants

At various times relevant to this Indictment:

7. LUIGI MANOCCHIO, a/k/a "Louie", a/k/a "Baby Shacks", a/k/a "The Professor", a/k/a "The Old Man", was a member, Underboss, and the Boss of the NELCN. MANOCCHIO received monthly protection payments, paid in cash by the owner and operator of certain adult entertainment businesses in Providence, Rhode Island, including the strip clubs known as the Satin Doll and the Cadillac Lounge.

8. THOMAS IAFRATE, a/k/a "Tommy" was an associate of the NELCN, who acted, at various times, under the authority of MANOCCHIO. IAFRATE at various times was employed as a bookkeeper for certain adult entertainment businesses in Providence, Rhode

Island, including the Satin Doll and the Cadillac Lounge. IAFRATE was responsible for setting aside, collecting and delivering the protection payments at various times to MANOCCHIO on behalf of the Satin Doll, the Cadillac Lounge, and other adult entertainment businesses.

9. RICHARD BONAFIGLIA and THEODORE CARDILLO, a/k/a "Teddy," were associates of the NELCN, who acted, at various times, under the authority of MANOCCHIO. BONAFIGLIA was employed as a bouncer at the Cadillac Lounge. CARDILLO was a manager of the Cadillac Lounge. BONAFIGLIA and CARDILLO provided reports to MANOCCHIO of the ongoing business affairs of the Cadillac Lounge which aided MANOCCHIO in maintaining control over the club.

The Racketeering Conspiracy

10. Beginning on or about a date unknown to the Grand Jury, but at least as early as 1989, and continuing thereafter through and including on or about the date of this Indictment, in the District of Rhode Island and elsewhere, the defendants

**LUIGI MANOCCHIO, a/k/a "Louie",
a/k/a "Baby Shacks", a/k/a "The Professor",
a/k/a "The Old Man,"
THOMAS IAFRATE, a/k/a "Tommy"
THEODORE CARDILLO, a/k/a "Teddy"
RICHARD BONAFIGLIA,**

together with others known and unknown to the Grand Jury, being persons employed by and associated with the NELCN, an enterprise which was engaged in, and the activities of which affected, interstate and foreign commerce, did unlawfully, knowingly and willfully conspire and agree together, and with other persons known and unknown to the Grand Jury, 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 the NELCN enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of multiple acts indictable under Title 18, United States Code, Section 1951 (Extortion).

11. It was a further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

Manner and Means of the Conspiracy

12. Among the manner and means by which the defendants, and others known and unknown to the Grand Jury, conducted and participated in the affairs of the NELCN enterprise, and accomplished and attempted to accomplish the objectives of the conspiracy, were the following:

a. It was part of the conspiracy that the defendants, and other members and associates of the NELCN enterprise, promoted a climate of fear through threats of force and violence.

b. It was a further part of the conspiracy that the defendants, and other members and associates of the NELCN enterprise, engaged in the use of threatened or implied force, violence and fear, to induce the owner and operator of certain adult entertainment businesses in Providence, Rhode Island, including the Satin Doll and the Cadillac Lounge, to provide monthly protection payments in cash. At various times, the monthly payment from these adult entertainment businesses ranged from \$4,000 to \$6,000 per month.

c. It was a further part of the conspiracy that defendants MANOCCHIO and IAFRATE, at various times, met with the owner and operator referenced above, to establish and

maintain the protection payments and their amounts, and to arrange for the delivery of the payments.

d. It was a further part of the conspiracy that defendant MANOCCHIO caused defendant IAFRATE to set aside and collect cash from the gross receipts of the adult entertainment businesses. Since approximately 2006, approximately \$125 each day was set aside from the proceeds of the Cadillac Lounge by IAFRATE for delivery to the NELCN. This amount was kept in a safe in the manager's office of the Cadillac Lounge, and covered the protection payment to the NELCN from the Satin Doll, the Cadillac Lounge, and the owner's other adult entertainment businesses.

e. It was a further part of the conspiracy that defendant MANOCCHIO caused defendant IAFRATE to collect and deliver the protection payments to the NELCN each month.

f. It was a further part of the conspiracy that defendant MANOCCHIO's consult and approval was required for business decisions at the Satin Doll, the Cadillac Lounge, and other adult entertainment businesses, including financial matters and the hiring and firing of certain employees, even though MANOCCHIO was never an owner or operator of these strip clubs, nor of any other adult entertainment businesses in Providence, Rhode Island.

g. It was a further part of the conspiracy that defendant MANOCCHIO caused the owner and operator of the Cadillac Lounge to hire defendants BONAFIGLIA and CARDILLO, and other members and associates of the NELCN, to enhance their financial status, and to exert and preserve the NELCN's control over the business affairs of the Cadillac Lounge, including the monthly protection payment.

h. It was a further part of the conspiracy that defendants IAFRATE, BONAFIGLIA and CARDILLO, and other members and associates of the NELCN, would meet at various times, and discuss the ongoing business affairs of the Cadillac Lounge, including matters related to the monthly protection payments and law enforcement's investigation into this unlawful scheme.

i. It was a further part of the conspiracy that defendants IAFRATE, BONAFIGLIA and CARDILLO, and other members and associates of the NELCN, provided reports to MANOCCHIO of the ongoing business affairs of the Cadillac Lounge to promote the purposes of the NELCN enterprise.

j. It was a further part of the conspiracy that the defendants, and other members and associates of the NELCN, engaged in further conduct to conceal the existence of the conspiracy, and to prevent the disclosure of their illicit activities.

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

COUNT TWO
(Extortion Conspiracy)

13. Paragraphs 7 through 9 and 12 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

14. Beginning on or about a date unknown to the Grand Jury, but at least as early as 1993, and continuing thereafter through and including on or about the date of this Indictment, in the District of Rhode Island and elsewhere, the defendants

LUIGI MANOCCHIO, a/k/a "Louie",
a/k/a "Baby Shacks", a/k/a "The Professor",
a/k/a "The Old Man,"
THOMAS IAFRATE, a/k/a "Tommy"
THEODORE CARDILLO, a/k/a "Teddy"
RICHARD BONAFIGLIA,

did conspire and agree together, and with others known and unknown to the Grand Jury, to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Title 18, United States Code, section 1951, that is, the defendants conspired to obtain U.S. currency, the property of the owner and operator of certain adult entertainment businesses in Providence, Rhode Island, including the strip clubs known as the Satin Doll and the Cadillac Lounge, with the owner and operator's consent induced by the wrongful use of force, violence, and fear.

All in violation of 18, United States Code, Section 1951(a).

COUNT THREE
(Extortion)

15. Paragraphs 7 through 9 and 12 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

16. On or about November 6, 2008, in the District of Rhode Island and elsewhere, the defendants

**LUIGI MANOCCHIO, a/k/a "Louie",
a/k/a "Baby Shacks", a/k/a "The Professor",
a/k/a "The Old Man," and
THOMAS IAFRATE, a/k/a "Tommy"**

did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Title 18, United States Code, section 1951, that is, the defendants obtained U.S. currency in the amount of approximately \$2,900.00, the property of the owner and operator of certain adult entertainment businesses in Providence, Rhode Island, including the strip clubs known as the Satin Doll and the Cadillac Lounge, with the owner and operator's consent induced by the wrongful use of force, violence, and fear.

All in violation of 18, United States Code, Section 1951(a).

FIRST FORFEITURE ALLEGATION

17. The allegations contained in Count One of this Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963 and Title 28, United States Code, Section 2461(c). Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of any defendant's conviction under Count One of this Indictment.

18. The defendants, LUIGI MANOCCHIO, a/k/a "Louie," a/k/a "Baby Shacks", a/k/a "The Professor", a/k/a "The Old Man," RICHARD BONAFIGLIA, THOMAS IAFRATE, a/k/a "Tommy" and THEODORE CARDILLO, a/k/a "Teddy":

a. 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);

b. have property constituting and derived from proceeds 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 pursuant to Title 18, United States Code, Section 1963(a)(3).

19. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1) and (a)(3), include but are not limited to, at least nine-hundred thousand dollars (\$900,000) in proceeds.

20. In the event any of the property described in paragraphs 18 and 19 above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, 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 Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendants up to the value of any property set forth in paragraphs 18 and 19 above.

21. 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

22. The allegations contained in Counts Two and Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

23. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of either offense alleged in Counts Two or Three or both, as violations of Title 18, United States Code, Section 1951, the defendants, LUIGI MANOCCHIO, a/k/a "Louie," a/k/a "Baby Shacks", a/k/a "The Professor", a/k/a "The Old Man," RICHARD BONAFIGLIA, THOMAS IAFRATE, a/k/a "Tommy" and THEODORE CARDILLO, a/k/a "Teddy", shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following: with respect to Count Two, U.S. Currency in the approximate amount of at least \$900,000; and with respect to Count Three, U.S. Currency in the approximate amount of \$2900.

24. If any of the property described above, 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 party;
- 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 divided
without difficulty,

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

THIS IS A TRUE BILL

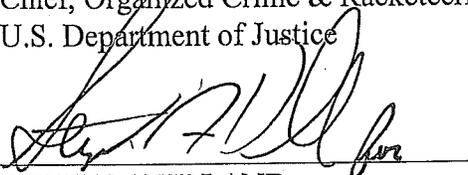
1



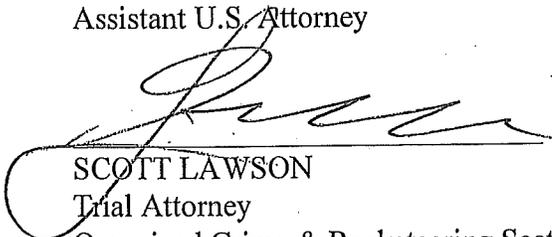
PETER F. NERONHA
United States Attorney



BRUCE G. OHR
Chief, Organized Crime & Racketeering Section
U.S. Department of Justice



WILLIAM FERLAND
Assistant U.S. Attorney



SCOTT LAWSON
Trial Attorney
Organized Crime & Racketeering Section
U.S. Department of Justice

Dated: March 1 2011.

United States v. LUIGI MANOCCHIO, a/k/a "Louie," a/k/a "Baby Shacks," a/k/a
"The Professor," a/k/a "The Old Man"

Count I (RICO Conspiracy, 18 U.S.C. § 1962(d))

MAX PENALTIES:

- a. 20 years imprisonment;
- b. \$250,000 fine;
- c. 3 years supervised release; and
- d. \$100 special assessment.

Count II (Extortion Conspiracy, 18 U.S.C. § 1951(a))

MAX PENALTIES:

- a. 20 years imprisonment;
- b. \$250,000 fine;
- c. 3 years supervised release; and
- d. \$100 special assessment.

Count III (Extortion, 18 U.S.C. §§ 1951)

MAX PENALTIES:

- a. 20 years imprisonment;
- b. \$250,000 fine;
- c. 3 years supervised release; and
- d. \$100 special assessment.

FIRST FORFEITURE ALLEGATION 18 U.S.C. § 1963

**SECOND FORFEITURE ALLEGATION 21 U.S.C. § 853(p) and 28 U.S.C. §
2461(c)**