

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

**FILED**

JAN 19 2011

UNITED STATES OF AMERICA

v.

ANTHONY M. ST. LAURENT, SR.  
*aka "The Saint"*

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CR. No. 09-041 S

**U.S. DISTRICT COURT  
DISTRICT OF R.I.**

PLEA AGREEMENT

Pursuant to Rule 11(c)(1)(A) of the Federal Rules of Criminal Procedure, the United States and Defendant, **ANTHONY M. ST. LAURENT, SR.** have reached the following agreement:

1. Defendant's Obligations.

a. Defendant will plead guilty to Count Two of the Indictment, which charges Defendant with Use of Interstate Commerce Facilities in the Commission of Murder-For-Hire, in violation of 18 U.S.C. § 1958.

b. Defendant admits his participation in the extortion conspiracy described in the criminal complaint against him in 10 MJ 27 A. Pursuant to U.S.S.G. §§ 1B1.3 and 5K2.21, Defendant consents to the Government providing information about the conduct charged in 10 MJ 27 A to U.S. Probation and the Court, and agrees that this is relevant conduct under the sentencing guidelines which the Court may consider when determining an appropriate sentence in this matter.

2. Government's Obligations. In exchange for Defendant's plea of guilty:

a. The government will recommend that the Court impose a term of imprisonment at the low end of the range of sentences for the offense level determined by the Court under the United States Sentencing Guidelines (the U.S.S.G. or "guidelines"), but not including probation or

a "split-sentence," even if permitted under the guidelines, provided that Defendant does not seek a downward departure under the guidelines or advocate for a sentence below the guideline range.

b. For purposes of determining the offense level, the government agrees to recommend a two-level reduction in the offense level for acceptance of responsibility under § 3E1.1(a) of the guidelines if Defendant continues to demonstrate acceptance of responsibility through sentencing.

c. As of the date of this agreement, Defendant has timely notified authorities of an intention to enter a plea of guilty. If the offense level is 16 or greater and Defendant enters a plea of guilty pursuant to this agreement, the government will move the sentencing Court for an additional decrease of one level, pursuant to U.S.S.G. § 3E1.1(b)(2), unless Defendant indicates an intention not to enter a plea of guilty, thereby requiring the government to prepare for trial.

d. The government is free to recommend any combination of supervised release, fines, and restitution which it deems appropriate.

e. The government will, at the time of sentencing, move to dismiss Count One of the indictment, charging Solicitation of Murder-For-Hire, in violation of 18 U.S.C. § 373. Also at sentencing, the government will move to dismiss the pending criminal complaint against Defendant in 10 MJ 27 A, in exchange for Defendant admitting to the conduct charged therein and agreeing to its use at sentencing.

3. Defendant understands that the guidelines are not binding on the Court, and that, although the Court must consult the guidelines in fashioning any sentence in this case, the guidelines are only advisory, and the Court may impose any reasonable sentence in this matter up

to the statutory maximum penalties after taking into account the factors enumerated in 18 U.S.C. § 3553(a).

4. The United States and defendant agree that U.S.S.G. § 2E1.4 applies to offenses involving a violation of 18 U.S.C. § 1958. The defendant stipulates and agrees to the attached statement of facts and consents to these facts being used by the Court and U.S. Probation in determining an appropriate sentence under the sentencing guidelines.

5. Except as expressly provided in the preceding paragraph, there is no agreement as to which Offense Level and Criminal History Category applies in this case. Both the United States and Defendant reserve their rights to argue and present evidence on all matters affecting the guidelines calculation.

6. The maximum statutory penalties for the offense to which defendant is pleading are 10 years imprisonment, a fine of \$250,000; a term of supervised release of three years; and a mandatory special assessment of \$100.

7. Defendant agrees that, after Defendant and Defendant's counsel sign this agreement, counsel will return it to the United States Attorney's Office along with a money order or certified check, payable to the Clerk, United States District Court, in payment of the special assessments. Failure to do so, unless the Court has made a previous finding of indigence, will relieve the government of its obligation to recommend a reduction in the offense level under the guidelines for acceptance of responsibility.

8. Defendant is advised and understands that:

a. The government has the right, in a prosecution for perjury or making a false statement, to use against Defendant any statement that Defendant gives under oath;

b. Defendant has the right to plead not guilty, or having already so pleaded, to persist in that plea;

c. Defendant has the right to a jury trial;

d. Defendant has the right to be represented by counsel – and if necessary have the Court appoint counsel – at trial and every other stage of the proceeding;

e. Defendant has the right at trial to confront and cross-examine adverse witnesses, to be protected from self-incrimination, to testify and present evidence, and to compel the attendance of witnesses; and

f. Defendant waives these trial rights if the Court accepts a plea of guilty.

9. The government reserves its full right of allocution, including the right to present any information to the Court for its consideration in fashioning an appropriate sentence, the right to correct misstatements, misrepresentations, or omissions by Defendant, and to answer any questions asked by the Court.

10. Except for paragraphs 2 and 4 above, the parties have made no agreement concerning the application of the guidelines in this case.

11. Defendant understands that the Court alone makes all sentencing decisions, including the application of the guidelines and the sentence to be imposed. The Court is not bound by the parties' stipulations of fact, offense level adjustments, or the government's recommendations. The Court is free to impose any sentence it deems appropriate up to and including the statutory maximum. Defendant also understands that even if the Court's guideline determinations and sentence are different than Defendant expects, Defendant will not be allowed to withdraw Defendant's plea of guilty.

12. Defendant hereby waives Defendant's right to appeal the conviction and sentence imposed by the Court, if the sentence imposed by the Court is within or below the sentencing guideline range determined by the Court. This agreement does not affect the rights or obligations of the United States as set forth in 18 U.S.C. § 3742(b), and the government retains its right to appeal any of the Court's sentencing determinations.

13. This agreement is binding on the government only if Defendant pleads guilty, fulfills all Defendant's obligations under the agreement, does not engage in any conduct constituting obstruction of justice under § 3C1.1 of the guidelines, and does not commit any new offenses. Defendant understands that if Defendant violates this agreement in any way, the government shall be released from its obligations under the agreement and will be free to make any recommendations that it deems appropriate. If that occurs, Defendant shall not have the right to withdraw Defendant's guilty plea.


14. This agreement is limited to the District of Rhode Island and the Criminal Division of the U.S. Department of Justice and does not bind any other federal, state, or local prosecutive authorities.

15. This agreement constitutes the entire agreement between the parties. No other promises or inducements have been made concerning the plea in this case. Defendant acknowledges that no person has, directly or indirectly, threatened or coerced Defendant to enter this agreement. Any additions, deletions, or modifications to this agreement must be made in writing and signed by all the parties in order to be effective.


16. Counsel for Defendant states that Counsel has read this agreement, been given a

copy of it for Counsel's file, explained it to Defendant, and states that to the best of Counsel's knowledge and belief, Defendant understands the agreement.


17. Defendant states that Defendant has read the agreement or has had it read to Defendant, has discussed it with Defendant's Counsel, understands it, and agrees to its provisions.

  
ANTHONY M. ST. LAURENT, SR.  
Defendant

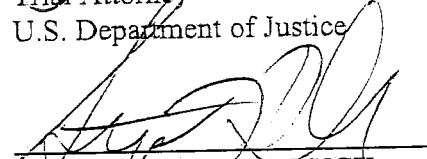
1/7/11  
Date

  
OLIN THOMPSON  
Counsel for Defendant

1/7/11  
Date

  
SCOTT LAWSON  
Trial Attorney  
U.S. Department of Justice

1/10/11  
Date

  
STEPHEN G. DAMBRUCH  
Assistant U.S. Attorney  
Chief, Criminal Division

01/11/2011  
Date

**Statement of Facts:**

The defendant stipulates and agrees to the following facts as the basis for his guilty plea in United States v. St. Laurent, Sr. 09-Cr-041 S (D. RI). The defendant expressly admits that the government's evidence against him would have proven these facts beyond a reasonable doubt had this matter proceeded to trial:

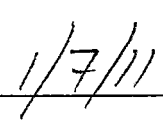
1. The defendant is a "made" (i.e., formally inducted) member of the New England branch of *La Cosa Nostra* (NELCN), an organized crime family also known as the Patriarca family. The New England LCN operates in Providence, Boston and elsewhere in New England. In 2006, the head of the New England LCN was an individual named Luigi "Louie" Manocchio, also known to the defendant as "the Professor" and "the Old Man."
2. The defendant developed an intense hatred for another made member of the NELCN, Robert "Bobby" DeLuca. In the spring of 2006, in retaliation for DeLuca having publicly accused defendant of being a government informant or "rat", defendant on several occasions solicited individuals known to him to be violent criminals to kill DeLuca. On each of these occasions, he indicated that he had received Manocchio's permission to kill DeLuca as required by the rules of the NELCN, and he offered the solicited individuals significant sums of money for them to carry out the murder.
3. On April 12, 2006, defendant met an individual from Taunton, Massachusetts in a parking lot in Johnston, Rhode Island. Defendant had arranged this meeting by using the telephone, a facility of interstate commerce, and knew that the individual would have to travel in interstate commerce to meet with him in Rhode Island. This individual did in fact, travel across state lines to attend this meeting with defendant. The defendant's intent in arranging this meeting was to solicit this individual to kill DeLuca.
4. On April 12, 2006, defendant and this individual drove together into Providence in order for the defendant to point out the Sidebar Restaurant, an establishment DeLuca was known to frequent. As consideration for the murder, defendant offered this individual a portion of a sum of money he anticipated that he would collect from an illegal bookmaker in Attleboro, Massachusetts, then known by the defendant to be paying "protection" money to DeLuca. With DeLuca dead, defendant anticipated that defendant would begin receiving the protection money and he offered a portion of this expected income as financial consideration for murdering DeLuca. During this conversation on April 12, 2006, defendant further stated that a portion of this money would have to go to Manocchio as well.
5. During the last six months of 2007, while incarcerated at the Federal Medical Center at Fort Devens, defendant repeatedly solicited another inmate to find someone who would kill DeLuca. This inmate expressed concerns about the problems that could befall someone who kills a "made" member of the LCN. Defendant indicated that he had received

permission [REDACTED]

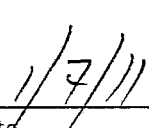
[REDACTED] Instead of offering financial compensation for DeLuca's murder, defendant offered only to "propose" the killer for membership in the LCN as reward for carrying out the murder.

6. Defendant met with this inmate on December 6, 2007 and again discussed the proposed murder in a conversation recorded by the government. During this conversation, the defendant repeatedly assured the inmate that he will suffer "no repercussions" from the LCN for his participation in arranging DeLuca's murder. Defendant further assured the inmate that defendant was serious about procuring DeLuca's murder and that he would not back out from the proposed plan. In the prison's visiting room, defendant was introduced to a visitor who he believed to be the person who would carry out DeLuca's murder. Defendant's only comment to this individual was "No repercussions."
7. The Defendant further admits that from at least as early as 1988 and continuing to February 3, 2009, he conspired with Anthony St. Laurent, Jr., Dorothy St. Laurent and others to use force and the threat of force to extort "protection" payments from a group of bookmakers in Taunton, Massachusetts, in violation of 18 U.S.C. § 1951, as charged in criminal complaint 10 MJ 027 A.

  
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ANTHONY M. ST. LAURENT, SR.  
Defendant

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
GLEN THOMPSON  
Counsel for Defendant

  
\_\_\_\_\_  
Date