

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
CHRISTOPHER SARAVELLO	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (conspiracy to commit Hobbs Act extortion - 1 count)
	:	18 U.S.C. § 1951(a) (Hobbs Act extortion - 5 counts)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times relevant to this indictment, the Philadelphia Police Department was a law enforcement agency in Philadelphia, Pennsylvania, responsible for investigating crimes in Philadelphia, and defendant CHRISTOPHER SARAVELLO was a Philadelphia police officer charged with enforcement of the laws of the Commonwealth of Pennsylvania, including laws prohibiting drug trafficking.

2. At all times relevant to this indictment, R.N., R.P. and N.M., all individuals known to the grand jury, were involved in the illegal possession, purchase and sale of controlled narcotics, including Oxycontin and Percocet, in Philadelphia.

3. During the period November 2011 through on or about June 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CHRISTOPHER SARAVELLO

knowingly conspired with R.N., R.P., and N.M., charged elsewhere, to obstruct, delay and affect, in any way or degree, commerce, and the movement of articles and commodities in commerce, by

extortion, in that defendant SARAVELLO conspired with R.N., R.P., and N.M., in the unlawful taking of money and other things of value, including United States currency and narcotics, including Oxycontin and Percocet, which was not due defendant SARAVELLO or his office, from another, with that person's consent, under color of official right.

Manner, Means and Object of the Conspiracy

It was part of the manner, means, and object of the conspiracy that:

4. Defendant CHRISTOPHER SARAVELLO and R.N., along with R.P., and N.M., entered into a scheme within the Eastern District of Pennsylvania to extort drugs and money from drug sellers and drug buyers.

5. As part of the scheme, R.N., R.P. or N.M. agreed to arrange to either purchase drugs from a drug seller targeted by the conspirators or arrange to sell drugs to a drug buyer targeted by the conspirators. R.N., R.P. or N.M. then alerted defendant CHRISTOPHER SARAVELLO as to the date, time and location of the planned transaction.

6. Defendant CHRISTOPHER SARAVELLO then interrupted the planned drug transaction and identified himself as a law enforcement officer by approaching the transaction in a marked police vehicle, wearing a police uniform, displaying an official badge and identification, verbally identifying himself as a police officer or carrying a firearm. Defendant SARAVELLO seized the narcotics being sold by the drug seller or the money being paid by the drug buyer. In doing so, defendant SARAVELLO used his status as a law enforcement officer to seize the controlled substance and/or money from the drug seller or buyer.

7. Defendant CHRISTOPHER SARAVELLO, R.N., with R.P. or N.M., then shared the drugs and/or money seized from the drug sellers and buyers by defendant

SARAVELLO.

Overt Acts

In furtherance of this conspiracy, and to accomplish its objectives, the conspirators, including defendant CHRISTOPHER SARAVELLO, committed the following overt acts, among others, in and around Philadelphia, Pennsylvania:

Extortion of J.L.

1. On or about November 1, 2011, R.N. met J.L., a person known to the grand jury, as part of an “arranged” purchase of Oxycontin pills. R.N., pretending that he was going to sell Oxycontin to J.L., received approximately \$4,600 from J.L.

2. R.N. directed J.L. to drive to a parking lot near Front and Spring Garden Streets in Philadelphia, where R.N. was supposed to obtain the pills.

3. R.N. notified defendant CHRISTOPHER SARAVELLO that he and J.L. would be arriving at the parking lot with cash for the fictional drug transaction.

4. Defendant CHRISTOPHER SARAVELLO arrived at the parking lot driving a Philadelphia Police Department van and in full police uniform.

5. R.N. walked away from J.L. and entered the police van. Defendant CHRISTOPHER SARAVELLO and R.N. left the parking lot in the police van, and shared the money taken from J.L.

Extortion of L.C.

6. On or about May 25, 2012, R.N. arranged to purchase Oxycontin, a controlled substance, from L.C., a person known to the grand jury. R.N. contacted defendant CHRISTOPHER SARAVELLO and told him where he was going to meet L.C.

7. R.N. met L.C. met in the area of 12th and Fitzgerald Streets in Philadelphia to make the transaction.

8. Defendant CHRISTOPHER SARAVELLO pulled up in a marked Philadelphia Police department car and exited the car dressed in full Philadelphia Police department uniform. Defendant SARAVELLO approached L.C. and R.N. and claimed to have seen a drug transaction.

9. Defendant CHRISTOPHER SARAVELLO ordered L.C. to retrieve the bag of Oxycontin that L.C. threw to the ground. Defendant SARAVELLO took the Oxycontin and told L.C. that L.C. would not be arrested.

10. Defendant CHRISTOPHER SARAVELLO put R.N. into the police car, pretending to arrest R.N., and drove R.N. from the area.

11. Defendant CHRISTOPHER SARAVELLO and R.N. shared the Oxycontin taken from L.C.

Extortion of R.Ne.

12. In approximately June, 2012, N.M. agreed to sell Percocet pills, a controlled substance, to R.Ne., a person known to the grand jury.

13. Defendant CHRISTOPHER SARAVELLO, N.M. and R.N. met in defendant SARAVELLO's car prior to the transaction and agreed that N.M. would go to R.Ne.'s house to pretend to have Percocet pills to sell to R.Ne. in exchange for cash. Defendant SARAVELLO agreed that he would arrive at the transaction and seize R.Ne.'s money.

14. N.M. traveled to R.Ne.'s house on the 1800 block of South Juniper Street and spoke to R.Ne. N.M. received approximately \$2,800 from R.Ne. After N.M. received the

money, defendant CHRISTOPHER SARAVELLO, wearing a police vest, drove onto the street, pointed his gun at N.M. and R.Ne., ordered N.M. and R.Ne. to stand against the wall, and took the cash from N.M. before leaving the area.

15. Defendant CHRISTOPHER SARAVELLO shared the seized money with N.M. and R.N.

Extortion of J.

16. In approximately June, 2012, R.P. called "J," a person known to the grand jury, and falsely arranged to sell Oxycontin pills, a controlled substance. R.N. contacted defendant CHRISTOPHER SARAVELLO and told him when and where the fraudulent transaction was going to take place.

17. As R.P. met "J" on a street corner in South Philadelphia, defendant CHRISTOPHER SARAVELLO drove up in a marked police car, and exited the car wearing a Philadelphia police uniform. Defendant SARAVELLO seized approximately \$1,200 from "J," placed R.P. into the police car, and drove away.

18. Defendant CHRISTOPHER SARAVELLO, R.P. and R.N. shared the money seized from "J."

Extortion of T.

19. In approximately June 2012, R.P. called "T," a person known to the grand jury, and falsely arranged to sell Oxycontin pills, a controlled substance. R.P. told R.N. when and where the transaction was scheduled to occur. R.N. notified defendant CHRISTOPHER SARAVELLO of the details about when and where the fraudulent transaction was going to take place.

20. As R.P. met "T" on a street corner in South Philadelphia, defendant CHRISTOPHER SARAVELLO drove up in a plain blue sedan, exited the car and identified himself as a police officer. Defendant SARAVELLO ordered R.P. and "T" to stand up against the wall, and frisked T, seizing approximately \$1,200 from him.

21. Defendant CHRISTOPHER SARAVELLO, R.P. and R.N. shared the money seized from "T."

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 and 4 through 7, and Overt Acts 1 through 5 of Count One of this indictment, are incorporated here.

2. On or about November 1, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CHRISTOPHER SARAVELLO

obstructed, delayed and affected, and aided, abetted and willfully caused the obstruction, delay and affect on commerce, and the movement of articles and commodities in commerce, by extortion, in that defendant SARAVELLO aided and abetted R.N. in the unlawful taking of property and things of value, that is, approximately \$4,600 United States currency, which was not due SARAVELLO or his office, from J.L., with that person's consent, under color of official right.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 and 4 through 7, and Overt Acts 6 through 11 of Count One of this indictment, are incorporated here.
2. On or about May 25, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CHRISTOPHER SARAVELLO

obstructed, delayed and affected, and aided, abetted and willfully caused the obstruction, delay and affect on commerce, and the movement of articles and commodities in commerce, by extortion, in that defendant SARAVELLO, along with R.N., unlawfully took property and things of value, that is, Oxycontin pills and other narcotics, which was not due SARAVELLO or his office, from L.C., with that person's consent, under color of official right.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 and 4 through 7, and Overt Acts 12 through 15 of Count One of this indictment, are incorporated here.

2. In or about June, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CHRISTOPHER SARAVELLO

obstructed, delayed and affected, and aided, abetted and willfully caused the obstruction, delay and affect on commerce, and the movement of articles and commodities in commerce, by extortion, in that defendant SARAVELLO, along with R.N. and N.M., unlawfully took property and things of value, that is, approximately \$2,800 United States currency, which was not due SARAVELLO or his office, from R.Ne., with that person's consent, under color of official right.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 and 4 through 7, and Overt Acts 16 through 18 of Count One of this indictment, are incorporated here.

2. In or about June, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CHRISTOPHER SARAVELLO

obstructed, delayed and affected, and aided, abetted and willfully caused the obstruction, delay and affect on commerce, and the movement of articles and commodities in commerce, by extortion, in that SARAVELLO, along with R.N. and R.P., unlawfully took property and things of value, that is, approximately \$1,200 United States currency, which was not due defendant SARAVELLO or his office, from J., with that person's consent, under color of official right.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 and 4 through 7, and Overt Acts 19 through 21 of Count One of this indictment, are incorporated here.
2. In or about June, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CHRISTOPHER SARAVELLO

obstructed, delayed and affected, and aided, abetted and willfully caused the obstruction, delay and affect on commerce, and the movement of articles and commodities in commerce, by extortion, in that defendant SARAVELLO, along with R.N. and R.P., unlawfully took property and things of value, that is, approximately \$1,200 United States currency, which was not due SARAVELLO or his office, from T., with that person's consent, under color of official right.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

A TRUE BILL:


ZANE DAVID MEMEGER
United States Attorney

FOREPERSON