

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No.
CARMINE DENTE, JR. : 18 U.S.C. §§ 1513(b) and 2

I N D I C T M E N T

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

COUNT ONE

Retaliation Against Individual 1

1. At all times relevant to this Indictment, defendant CARMINE DENTE, JR. was an employee and the son of one of the principal owners of a towing company located in Newark, New Jersey ("Towing Company 1"). Towing Company 1 contracted with the New Jersey Turnpike Authority (the "NJTA") to provide heavy-duty towing services on certain portions of the New Jersey Turnpike.

2. From in or about January 2003 to in or about December 2004, there was an individual who was the Manager of Emergency Services for the NJTA (the "ES Manager"). In that capacity, the ES Manager was responsible for managing the assignment of heavy-duty towing services on the New Jersey Turnpike. The ES Manager's responsibilities included oversight of towing companies contracting with the NJTA to provide heavy duty towing services, including Towing Company 1 and another towing company in

Middlesex County, New Jersey ("Towing Company 2").

3. From in or about the Spring of 2004, to in or about December 2004, an individual ("Individual 1") affiliated with Towing Company 2 provided information to the Federal Bureau of Investigation ("FBI") regarding the ES Manager's extortionate and corrupt conduct. Based on the information provided by Individual 1, the FBI commenced an investigation involving the ES Manager's conduct related to his official position with the NJTA and caused Individual 1 to record contact with the ES Manager.

4. On or about December 31, 2004, as a result of the FBI investigation, the ES Manager resigned his position with the NJTA. On or about May 11, 2005, the ES Manager entered a guilty plea in United States District Court to an Information charging him with extorting Individual 1 and Towing Company 2, under color of official right, in violation of Title 18, United States Code, Section 1951(a).

5. On or about November 16, 2006, defendant CARMINE DENTE, JR. assaulted Individual 1 at a bar in Rahway, New Jersey, causing Individual 1 to receive approximately fifteen stitches, in connection with a head wound, in retaliation for Individual 1's assistance to the FBI during the investigation of the ES Manager.

6. On or about November 16, 2006, in Union County, in the District of New Jersey, defendant

CARMINE DENTE, JR.

did knowingly and intentionally engage in conduct causing bodily injury to another person, namely Individual 1, with intent to retaliate against Individual 1 for information given by Individual 1 to a law enforcement officer relating to the commission and possible commission of a Federal offense.

In violation of Title 18, United States Code, Sections 1513(b) and 2.

FOREPERSON

CHRISTOPHER J. CHRISTIE
UNITED STATES ATTORNEY