

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Claire C. Cecchi
v. : Criminal No.: 14-
ROBERT J. SCERBO, : 18 U.S.C. § 1962(d)
a/k/a "Worm"

INFORMATION
(Racketeering Conspiracy)

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Background

1. At all times relevant to this Information:

The Racketeering Enterprise

a. A website (hereinafter the "Website") was used to promote and facilitate an illegal sports betting and gambling business in northern New Jersey and elsewhere. The Website was maintained in Costa Rica and, at times, referred to as the "office." The individuals who owned, operated, and directed the activities of the Website conspired with individuals known as "electronic bookies" or "agents," who established illegal gambling businesses in New Jersey and elsewhere. Many agents also maintained a network of "sub-agents," who operated at the direction of the agents in furtherance of the illegal gambling businesses. The agent, sub-agent, or their co-conspirators issued usernames and passwords to individual bettors who, through the Website, placed wagers on, among other things, sporting events. Through the Website,

the agent, sub-agent, and their co-conspirators were then able to track each individual bettor, his or her wagers, and each bettor's weekly "wins" and "loses." This "electronic portfolio" was referred to as the agent's or sub-agent's "package." The owners, operators, and employees of the Website, together with the agents and sub-agents, constituted a criminal enterprise, as that term is defined in Title 18, United States Code, Section 1961(4)(hereinafter the "Criminal Enterprise"). The Criminal Enterprise constituted an ongoing organization whose members functioned as a continuing unit that had a common purpose of achieving the objectives of the Criminal Enterprise. Although wagers were placed through the Website, as described above, all pay outs of gambling winnings and collections of gambling losses were made in person between meetings with the bettor and the agents, sub-agents, and their co-conspirators.

The Defendant and Other Parties and Entities

b. Co-Conspirator One, an individual not named as a defendant herein, operated and maintained an interest in the Website and was a member of the Criminal Enterprise.

c. Co-Conspirator Two, an individual not named as a defendant herein, was employed by and acted as an agent for the Website and was a member of the Criminal Enterprise.

d. Defendant ROBERT J. SCERBO, a resident of Bayonne, New Jersey, was a sub-agent for the Website and an associate of the Criminal

Enterprise who issued usernames and passwords to bettors and made collections of gambling debts.

e. Co-Conspirator Three, an individual not named as a defendant herein, was a resident of Bayonne, New Jersey. Co-Conspirator Three was an agent for the Website and an associate of the Criminal Enterprise.

f. Co-Conspirator Four, an individual not named as a defendant herein, was a resident of Bayonne, New Jersey. Co-Conspirator Four was a sub-agent for the Website and an associate of the Criminal Enterprise.

The Purposes of the Criminal Enterprise

2. The purposes of the Criminal Enterprise included the following: (a) enriching the owners, operators, employees, agents, sub-agents of the Website and their co-conspirators; and (b) avoiding law enforcement detection of their illegal activities and the proceeds derived through those activities.

The Racketeering Conspiracy

3. From in or about early 2008 and continuing through in or about May 2012, in Hudson County, in the District of New Jersey and elsewhere, defendant

ROBERT J. SCERBO,
a/k/a "Worm,"

being a person employed by and associated with the Criminal Enterprise, an enterprise that was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired and agreed with

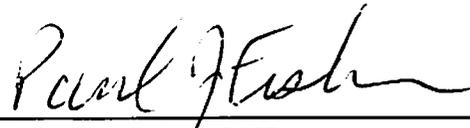
Co-Conspirator One, Co-Conspirator Two, Co-Conspirator Three, Co-Conspirator Four, and others to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity and through the collection of unlawful debt.

4. The pattern of racketeering activity, as that term is defined by Title 18, United States Code, Sections 1961(1) and 1961(5), through which defendant ROBERT J. SCERBO, a/k/a "Worm," together with others, agreed to conduct, and participate, directly and indirectly, in the conduct of the affairs of the enterprise consisted of multiple acts indictable under federal law, namely, Title 18, United States Code, Sections 1084 (transmission of wagering information related to sports betting in interstate and foreign commerce) and 1955 (prohibition of illegal gambling businesses). It was part of the conspiracy that defendant ROBERT J. SCERBO, a/k/a "Worm," and his co-conspirators each agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

5. The collection of unlawful debt, as that term is defined by Title 18, United States Code, Section 1961(6), through which defendant ROBERT J. SCERBO, a/k/a "Worm," together with others, agreed to conduct, and participate, directly and indirectly, in the conduct of the affairs of the enterprise consisted of the collection of multiple debts incurred and contracted in gambling activity which was in violation of the laws of the State of New Jersey, and which was incurred in connection with the business of gambling in

violation of the laws of the State of New Jersey. It was part of the conspiracy that defendant ROBERT J. SCERBO, a/k/a "Worm," and his co-conspirators each agreed that a conspirator would commit at least one collection of unlawful debt in the conduct of the affairs of the enterprise.

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



PAUL J. FISHMAN
United States Attorney

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INFORMATION FOR

Title 18, United States Code, Section 1962(d)

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