

United States District Court
District of New Jersey

ORIGINAL FILED

NOV 16 2010

MADELINE COX ARLEO
U.S. MAG. JUDGE

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT

v. :

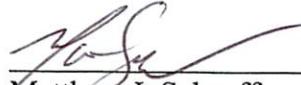
VINCENT J. COREY : Magistrate No. 10-8278
a/k/a "John Russio"

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From in or about July 2010 to on about August 6, 2010, in the District of New Jersey, and elsewhere, defendant VINCENT J. COREY a/k/a "John Russio" did:

SEE ATTACHMENT A

I further state that I am a Special Agent of the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B



Matthew J. Schaeffer
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed in my presence,

11/16/2010 at 3:05pm
Date

Newark, New Jersey
City and State

Hon. Madeline Cox Arleo
United States Magistrate Judge
Name and Title of Judicial Officer

Madeline Cox Arleo
Signature of Judicial Officer

ATTACHMENT A

COUNT 1

(Interstate Transportation of Stolen Property)

On or about July 26, 2010, in the District of New Jersey and elsewhere, defendant

VINCENT J. COREY
a/k/a "John Russio"

did knowingly transport, transmit, and transfer in interstate commerce goods, wares, and merchandise, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud.

In violation of Title 18, United States Code, Section 2314 and Section 2.

COUNT 2

(Sale of Stolen Property)

From in or about July 2010 to on or about August 6, 2010, in the District of New Jersey and elsewhere, defendant

VINCENT J. COREY
a/k/a "John Russio"

did knowingly possess, conceal, store, barter, sell, and dispose of goods, wares and merchandise of the value of \$5,000 or more, which crossed a State boundary after being stolen, unlawfully converted and taken, knowing the same to have been stolen, unlawfully converted, and taken.

In violation of Title 18, United States Code, Section 2315 and Section 2.

ATTACHMENT B

I, Matthew J. Schaeffer, a Special Agent of the Federal Bureau of Investigation, am fully familiar with the facts set forth herein based on my investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Since this complaint is being submitted for the limited purpose of establishing probable cause to support the issuance of a complaint and arrest warrant, I have not set forth each and every fact that I know concerning the investigation. Where statements of others are related herein, they are related in substance and in part.

1. At all times relevant and material to this Complaint:
 - a. ITT Corporation ("ITT") was an engineering and manufacturing company that among other things, provided mission critical products and services that supported the United States military and its allies.
 - b. Among ITT's assets were frequency generators, which were used as testers in the manufacturing process of other items to mimic radio frequencies of surface to air missiles.
 - c. Defendant VINCENT J. COREY a/k/a "John Russio" (hereinafter "COREY") was a staff engineer for ITT for approximately five years who had a Department of Defense security clearance that allowed him access to a secured area of the ITT premises in Clifton, New Jersey with a personal identification number.
 - d. The secured area contained among other items, an Agilent PSG CW Signal Generator E8257D O Option 1E1, 1EH, 520, HAR, UNT, UNW, + UNX (hereinafter "frequency generator"), which was valued at approximately \$50,000. The frequency generator was last accounted for in inventory on or about June 22, 2010.
 - e. Individual 1 was an employee of Corporation 1, which was a leasing equipment company in Cupertino, California.

2. In or about July 2010, defendant COREY, using the fictitious name "John," contacted Corporation 1's eBay account, offering to sell a frequency generator for \$20,000.

3. Individual 1, responding to the offer, negotiated the terms and conditions of the sale of the frequency generator with defendant COREY, who used the fictitious name "John Russio."

4. On or about Sunday, July 25, 2010, defendant COREY was seen on video surveillance entering the premises of ITT in Clifton, New Jersey carrying an empty duffle bag. Defendant COREY thereafter accessed the secured area of the premises of ITT, and was seen on video surveillance leaving the premises with a duffle bag that appeared to contain an object. The duffle bag was large enough to contain a frequency generator.

5. On or about Monday, July 26, 2010, defendant COREY, using the fictitious name "John Russio," shipped, via UPS, a package with a declared value of "\$20,000" to Corporation 1.

6. On or about August 5, 2010, defendant COREY, using the fictitious name "John Russio," forwarded an invoice for \$20,000 for the frequency generator to Corporation 1. That same day, Individual 1 sent a "Contract for the Sales [sic] of Personal Property" ("Contract") as between "John Russio" as Seller, and Corporation 1 as Buyer, for the sale of the frequency generator for a total purchase price of \$20,000. Defendant COREY thereafter faxed from his home address in West New York, New Jersey, the Contract to Corporation 1, which was executed under the fictitious name, "John Russio."

7. Additionally, on or about August 5, 2010, Individual 1, when receiving a telephone call from "John Russio," noted that the name that appeared on the telephone caller identification system was "Corey Vincent." Telephone records obtained from a telephone service provider confirmed that defendant COREY subscribed to the cellular telephone number provided by "John Russio" to Individual 1, which was also the same telephone number set forth on the Contract.

8. On or about August 6, 2010, defendant COREY e-mailed Individual 1 to ascertain the status of payment. Subscriber information obtained from an internet service provider confirmed that defendant COREY subscribed to the e-mail address utilized in the e-mail to Individual 1. That subscriber information also reported the same cellular telephone number as the telephone number provided on the Contract.

9. On or about August 9, 2010, Individual 1, concerned about the significantly discounted price of the equipment, regularly valued at approximately \$50,000, contacted the manufacturer of the equipment to verify the serial number. The manufacturer in turn advised Individual 1 that it had sold the equipment to ITT.