

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal Number: 10-
PETER RINALDI : 18 U.S.C. § 1951(a)

I N F O R M A T I O N
(Conspiracy to Commit Extortion)

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:
 - a. Defendant PETER RINALDI was a resident of Bayonne, New Jersey.
 - b. An individual, not named as a defendant herein, was a co-conspirator (hereinafter the "Co-Conspirator").
 - c. An individual (hereinafter the "Victim") was the principal of a development company headquartered in Bayonne, New Jersey (hereinafter "Company One"), which company was engaged in the construction industry.
 - d. A second construction company was headquartered in Bayonne, New Jersey (hereinafter "Company Two") and also engaged in the construction industry.

The Bayonne Construction Project

2. Company One was the contract manager for a twelve unit condominium project in Bayonne, New Jersey (hereinafter the "Project"). Company One subcontracted Company Two to install tile at the Project. Thereafter, a billing dispute ensued between Company One and Company Two, and Company Two claimed that it was owed approximately \$60,000 by Company One for work and materials related to the Project.

The Conspiracy

3. From on or about December 30, 2009 through on or about January 15, 2010, in Hudson County, in the District of New Jersey and elsewhere, defendant

PETER RINALDI

knowingly and intentionally conspired and agreed with the Co-Conspirator and others to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion, by obtaining the property of another person, namely the Victim, with the consent of such person, induced by wrongful use of actual and threatened force, violence, and fear.

Object of the Conspiracy

3. The object of the conspiracy was to use violence and threats of violence to obtain approximately \$60,000 from the Victim, representing money allegedly owed by his company to Company Two.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant PETER RINALDI instructed the Co-Conspirator to "strike fear" in the Victim.

5. It was further part of the conspiracy that the Co-Conspirator assaulted, threatened, and intimidated the Victim.

6. It was further part of the conspiracy that defendant PETER RINALDI, using a disposable phone, repeatedly called the Victim and threatened him with physical violence unless he paid approximately \$60,000 to Company Two.

7. It was further part of the conspiracy that defendant PETER RINALDI instructed the Victim to personally deliver a check, made payable to Company Two and in the approximate amount of \$60,000, to a restaurant in Bayonne, New Jersey.

8. In furtherance of the conspiracy and to effect the unlawful object thereof, defendant PETER RINALDI and his co-conspirators, committed and caused to be committed the following acts in the District of New Jersey and elsewhere:

a. On or about December 30, 2009, the Co-Conspirator hit the Victim in the head with a bat.

b. On or about January 15, 2010, using a disposable phone, defendant PETER RINALDI threatened the Victim, as follows:

"You think it's a f-----g game? You take [care] of what the f--k you gotta take care of by 4:30. . . . You live on [Victim's street] in f-----g [Victim's city of residence]. . . . There ain't no f-----g cops and there ain't no feds that are gonna help you this time. Okay. . . . You got an hour to take care of this.

* * * *

[G]o pay what you gotta pay. . . . You ain't dealing with street criminals here, bud. . . . Next is gonna be [the Victim's residence]. Okay?

* * * *

Well, you've had three days to do that. Okay. You've had three days. . . . [T]his ain't no joke. . . . Just so you know, someone's posted up by you. Someone's posted up at your house in [Victim's city of residence]. . . . You ain't got nowhere to f-----g go. You ain't got no help. You ain't got no cops. No feds. You ain't got nothing helping you here pal. . . .

* * * *

c. On or about January 15, 2010, using a disposable phone, defendant PETER RINALDI directed the Victim to deliver a check, payable to Company Two, to a restaurant in Bayonne, New Jersey, as follows:

You hand'em the check. No questions asked and you get on your way. Ain't no one gonna do anything to you. But I'm telling you right now. I don't give a f--k who's listening to this conversation. Okay? I'm telling you on my kids, if you do anything foolish . . . there's people in front of your house right now. . . . If you're foolish, you're only gonna get one person right now. Guess what? I got forty more f-----g people who are gonna come sick at you.

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

A handwritten signature in blue ink that reads "Paul J. Fishman". The signature is written in a cursive style with a horizontal line extending from the end of the name.

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

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UNITED STATES OF AMERICA

v.

PETER RINALDI

INFORMATION FOR

Title 18, United States Code, Section 1951

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