

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 14-
 :
 v. : 18 U.S.C. § 1341 and § 2
 :
 ROBERT NAPOLITANO : Hon.

I N F O R M A T I O N

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

1. At all times relevant to this Information:

A. Defendant ROBERT NAPOLITANO ("defendant NAPOLITANO") was the owner of Dawn to Dusk Solutions LLC ("Dawn to Dusk"), an insurance adjusting company located in Little Falls, New Jersey.

B. The New Jersey Turnpike Authority (the "NJTA") was an agency of the State of New Jersey whose primary mission was to construct, maintain, repair, and operate the New Jersey Turnpike and other New Jersey roadways, to fix and establish tolls, and to issue revenue bonds and notes.

C. Gerardo Blasi ("Blasi") was employed by the NJTA as a claims manager. As a claims manager for the NJTA, Blasi's responsibilities included, but were not limited to, dealing with the

insurance companies of motorists who caused damage to property belonging to the NJTA. In Blasi's interactions with the insurance companies, he regularly would provide them with the necessary paperwork to establish that damage had been done to NJTA property, the cost to repair the damage, and proof that the damage was caused by the motorists insured by the insurance companies. Upon submitting paperwork to the insurance companies, Blasi would attempt to collect the cost of the repairs from those insurance companies. Blasi also had the authority to negotiate settlements for lesser amounts.

2. From in or about October 2011 to in or about June 2013, in the District of New Jersey and elsewhere, defendant

ROBERT NAPOLITANO

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud the NJTA and certain insurance companies and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

3. It was part of the scheme and artifice to defraud that:

A. In or about October 2011, defendant NAPOLITANO reached an agreement with Blasi to perform insurance claims adjusting for the NJTA. As part of the agreement, it was defendant NAPOLITANO's responsibility to evaluate the damage caused by the

insured motorist, create an estimate of the cost to repair the damage, and negotiate with the particular insurance company to arrive at a repair amount. After defendant NAPOLITANO and the insurance company reached an agreement on the payment amount, defendant NAPOLITANO would request that the check issued by that insurance company for the cost of repairing the damage be made payable to Dawn to Dusk and mailed to defendant NAPOLITANO's business address in Little Falls, New Jersey. Upon receiving this check made payable to Dawn to Dusk for the cost of repairs via the mail, defendant NAPOLITANO often times would deposit the check into his business bank account and then either issue a check to Blasi or provide Blasi with his share of the proceeds in cash and then keep the remainder of the proceeds himself. Thus, on most occasions, defendant NAPOLITANO and Blasi kept all of the money sent to Dawn to Dusk by the particular insurance company to settle the claim and did not pass any of the money for that particular claim on to the NJTA as they were obligated to do.

B. In addition, from time to time, instead of keeping all the insurance proceeds, defendant NAPOLITANO issued checks to the NJTA for a portion of the proceeds received from the insurance company, and then would split the remainder of the proceeds between himself and Blasi.

C. Defendant NAPOLITANO and Blasi continued with this scheme until in or about June 2013. As a result of this scheme,

defendant NAPOLITANO and others defrauded the NJTA and various insurance companies of at least approximately \$900,000.

4. On or about the dates listed below, in Passaic County, in the District of New Jersey, and elsewhere, for the purpose of executing and attempting to execute this scheme and artifice to defraud, defendant

ROBERT NAPOLITANO

placed and caused to be placed in a post office and authorized depository for mail matter to be sent and delivered by the United States Postal Service, and did take and receive therefrom, the following mail matter:

| DATE (ON OR ABOUT) | MAILING |
|--------------------|---|
| October 11, 2011 | A check mailed from a nationwide insurance company to Dawn to Dusk. This check listed the claimant as the NJTA and it was made payable to Dawn to Dusk in the amount of \$25,000. |
| October 26, 2011 | A check mailed from a nationwide insurance company to Dawn to Dusk. This check listed the claimant as NJTA and it was made payable to Dawn to Dusk in the amount of \$75,000. |
| March 29, 2012 | A check mailed from a nationwide insurance company to Dawn to Dusk. This check listed the NJTA as the claimant and it was made payable to Dawn to Dusk in the amount of \$27,500. |

In violation of Title 18, United States Code, Section 1341
and Section 2.

Paul J. Fishman/rah

PAUL J. FISHMAN
United States Attorney