

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 15-
 :
 JOHN GROSSO : 18 U.S.C. § 981(a)(1)(C)
 : 18 U.S.C. § 1951(a)
 : 28 U.S.C. § 2461(c)

INFORMATION

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

Introduction

1. At all times relevant to this Information:

a. Defendant JOHN GROSSO was a Corrections Officer at the Essex County Correctional Facility ("Essex County Jail") in Newark, New Jersey.

b. J.P. was a federal pretrial detainee at the Essex County Jail.

c. There was an individual who was a relative of J.P. and resided in Newark, New Jersey (the "Relative").

d. The Essex County Jail was a facility in New Jersey that held federal pretrial detainees by direction of, or pursuant to, a contract or agreement with the United States Attorney General.

The Conspiracy

2. In or about December 2013, in Essex County, in the District

of New Jersey, defendant

JOHN GROSSO

did knowingly and intentionally conspire and agree with the Relative and others to obstruct, delay, and affect interstate commerce by extortion under color of official right, by accepting a corrupt payment that was paid by J.P., with J.P.'s consent, in exchange for JOHN GROSSO's official action and assistance in violation of his official duties at the Essex County Correctional Facility.

Object of the Conspiracy

3. The object of the conspiracy was for GROSSO to receive a payment from J.P. through the Relative in exchange for smuggling contraband, including a cellular telephone, into the Essex County Jail for distribution to J.P.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. The Relative retrieved contraband, including cigarettes and a cellular telephone manufactured outside of New Jersey, to be smuggled into the Essex County Jail by defendant JOHN GROSSO, in exchange for payment.

b. Defendant JOHN GROSSO received a cash payment from the Relative in Secaucus, New Jersey, for defendant JOHN GROSSO's assistance in smuggling the contraband into the Essex County Jail.

c. Defendant JOHN GROSSO smuggled the contraband into

the Essex County Jail and delivered it to J.P.

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

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendant JOHN GROSSO, that upon conviction of the offense charged in this Information, the government will seek forfeiture in the amount of \$1,000 in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offense to forfeit any property constituting or derived from proceeds traceable to such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other

property of defendant JOHN GROSSO up to the value of the forfeitable property described in paragraph 2.



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 15-

United States District Court
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UNITED STATES OF AMERICA

v.

JOHN GROSSO

INFORMATION FOR

18 U.S.C. § 918(a)(1)(C)
18 U.S.C. § 1951(a)
28 U.S.C. § 2461(c)

PAUL J. FISHMAN

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