

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor  
v. :  
: Mag. No. 15-7140  
NICHOLAS LATTANZIO : CRIMINAL COMPLAINT  
: :  
:

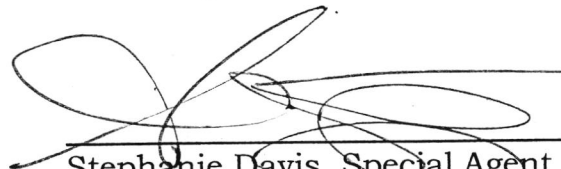
I, Stephanie Davis, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**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**


continued on the attached pages and made a part hereof.

  
Stephanie Davis, Special Agent  
Federal Bureau of Investigation

Sworn to before me, and  
subscribed in my presence

June 9, 2015 at  
Newark, New Jersey

HONORABLE CATHY L. WALDOR  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**

**Counts 1 through 3**  
**(Wire Fraud)**

From at least as early as in or around June 2013 through in or around November 2014, in the District of New Jersey and elsewhere, defendant

**NICHOLAS LATTANZIO**

knowingly and intentionally devised a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate commerce the following writings, signs, signals, and sounds, each constituting a separate count of this Complaint:

<b>Count</b>	<b>Approximate Date</b>	<b>Description</b>
1	December 27, 2013	Wire transfer of approximately \$124,000 sent from LATTANZIO to a Land Rover dealership in or around Paramus, New Jersey for the purchase of a car
2	August 21, 2014	Wire transfer of approximately \$1.95 million sent from Company B's bank account to a brokerage account controlled by LATTANZIO in New Jersey
3	August 21, 2014	Wire transfer of approximately \$1,048,956 sent from an account controlled by LATTANZIO to a title company in New Jersey in connection with the purchase of a home in or around Upper Montclair, New Jersey

In violation of Title 18, United States Code, Section 1343 and Section 2.