

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No. 14-
	:	
v.	:	18 U.S.C. § 1343
	:	18 U.S.C. § 1349
PAUL MANCUSO	:	18 U.S.C. § 2
a/k/a "PMan"	:	
a/k/a "P-Man"	:	
and PASQUALE STISO	:	
a/k/a "Pat Stiso"	:	

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT ONE
(Wire Fraud Conspiracy)

Background

1. At all times relevant to this Indictment unless otherwise specifically noted:

a. Defendant PAUL MANCUSO, a/k/a "P-Man" or "PMan" ("MANCUSO") was resident of Bergen County, New Jersey.

b. Defendant PASQUALE STISO, a/k/a "Pat Stiso" ("STISO") was a resident of Westchester County, New York.

c. PMAN Enterprises LLC was a New Jersey Limited Liability Company that purportedly maintained a place of business in Fair Lawn, New Jersey. MANCUSO was responsible for the day-to-day operations and management of PMAN Enterprises LLC.

The Conspiracy

2. From in or around 2009 through on or about March 5, 2013, in the District of New Jersey and elsewhere, defendants

PAUL MANCUSO,
a/k/a "P-Man,"
a/k/a "PMan,"
and
PASQUALE STISO,
a/k/a "Pat Stiso,"

knowingly and intentionally conspired and agreed with each other and others to devise 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 such scheme and artifice to transmit and cause to be transmitted writings, signs, signals, pictures and sounds by means of interstate wire communications contrary to Title 18, United States Code, Section 1343.

Object of the Conspiracy

3. It was the object of the conspiracy for MANCUSO, STISO, and others to obtain money and property from victims by means of false and fraudulent pretenses, representations, and promises.

The Scheme to Defraud

4. It was part of the conspiracy that MANCUSO held himself out as a real estate investor, broker, and developer, as well as a "hard money" lender and broker of other various purported investments.

5. It was further part of the conspiracy that STISO held himself out as an individual who was working with MANCUSO on some of the various purported investments.

6. It was further part of the conspiracy that since 2009, MANCUSO created a number of different fictitious investment opportunities by which he, STISO, and other co-conspirators obtained victims' money by means of materially false and fraudulent pretenses, representations, and promises.

7. It was further part of the conspiracy that MANCUSO, STISO, and other co-conspirators solicited investors for these purported "investments" when, in fact, the investments did not exist or MANCUSO and STISO had no involvement with the investments.

8. It was further a part of the conspiracy that MANCUSO and STISO spent their victims' money for their own personal benefit, including to finance their involvement in gambling pursuits, and never invested the monies in any of the purported investments.

Manner and Means of the Conspiracy

9. It was further part of the conspiracy that MANCUSO and STISO recruited victims to invest in a ticket scheme. MANCUSO and STISO falsely represented to victims that they purchased event tickets, such as tickets to sporting events and concerts, at a cut or wholesale rate, and then resold them to members of the public at an inflated rate, creating significant profits for

their investors. In reality, MANCUSO and STISO did not buy tickets with their victims' money.

10. It was further part of the conspiracy that defendant MANCUSO recruited victims to invest in a purported pizzeria at a resort in the Bahamas. MANCUSO falsely represented to victims that he was engaged in a deal to purchase and/or develop a pizzeria at a resort in the Bahamas, and that he needed investors to consummate the deal. In reality, MANCUSO was not involved in either the purchase or development of any restaurants at a resort in the Bahamas.

11. It was further part of the conspiracy that MANCUSO recruited victims to invest in a residential real estate project in Florida. MANCUSO falsely represented to victims that he was involved in a project to redevelop a residential apartment community in Florida. In reality, MANCUSO was not involved in a residential real estate project in Florida.

12. It was further part of the conspiracy that MANCUSO recruited victims to invest in what he characterized as the last oceanfront property in Atlantic City, New Jersey, on which a casino could be built. MANCUSO falsely represented to victims that he was engaged in negotiations for a joint venture with a prominent company to build a casino on that property. In reality, MANCUSO was not involved in the development of a casino in Atlantic City.

13. It was further part of the conspiracy that MANCUSO recruited victims to invest in the development of a commercial shopping center project. MANCUSO alternately represented to victims that the shopping center was located in Connecticut or New York. In reality, MANCUSO was not involved in the development of a shopping center in Connecticut, New York, or elsewhere.

14. It was further part of the conspiracy that MANCUSO and STISO recruited victims to invest in a purported real estate project in Matawan, New Jersey. Specifically, MANCUSO and STISO falsely represented to their victims that they were engaged in a transaction in which they were purchasing a piece of property in Matawan, demolishing an existing structure on the property, and then "flipping" or reselling the property to a buyer who intended to redevelop the property at a significant profit for their investors. In reality, MANCUSO and STISO were not engaged in any such transaction.

15. It was further part of the conspiracy that MANCUSO and STISO used interstate wire communications to devise their schemes and artifices to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH FIVE
(Wire Fraud)

16. The allegations contained in paragraphs 1 and 3 through 15 of this Indictment are repeated and realleged as if fully set forth herein.

17. On or about the dates set forth below, in the District of New Jersey and elsewhere, having devised and intending to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, defendant

PAUL MANCUSO,
a/k/a "P-Man,"
a/k/a "PMan,"

for the purpose of executing and attempting to execute a scheme to defraud, knowingly and intentionally did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce the following writings, signs, signals, pictures and sounds, for the purpose of executing such scheme and artifice:

Count	Wire Transfer	Approximate Date	Sent From	Sent To
2	Electronic transfer of funds of approximately \$100,000	July 11, 2011	Oregon	New Jersey
3	Electronic transfer of funds of approximately \$80,000	December 9, 2011	Delaware	New Jersey
4	Electronic transfer of funds of approximately \$100,000	September 6, 2012	New York	New Jersey
5	Electronic transfer of funds of approximately \$25,000	September 14, 2012	New York	New Jersey

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

COUNT SIX
(Wire Fraud)

18. The allegations contained in paragraphs 1 and 3 through 15 of this Indictment are repeated and realleged as if fully set forth herein.

19. On or about October 5, 2012, in the District of New Jersey and elsewhere, having devised and intending to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, defendants

PAUL MANCUSO,
a/k/a "P-Man,"
a/k/a "PMan,"
and
PASQUALE STISO,
a/k/a "Pat Stiso,"

for the purpose of executing and attempting to execute a scheme to defraud, knowingly and intentionally did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce an electronic transfer of funds of approximately \$75,000, for the purpose of executing such scheme and artifice.

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

FIRST FORFEITURE ALLEGATION

1. The allegations contained in all paragraphs of Counts 1 through 6 of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to the defendants that, upon conviction of the offenses charged in Counts 1 through 6 of this Indictment, the government will seek forfeiture, in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Sections 1343, 1349, and 2 alleged in Counts 1 through 6 of this Indictment, including but not limited to a sum of money equal to at least \$3,425,750 in United States currency.

3. If by any act or omission of the defendants, any of the property subject to forfeiture described in paragraph 2 herein:

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 subdivided without difficulty, the United States of
America will be entitled to forfeiture of substitute property up
to the value of the property described above in paragraph 2,
pursuant to Title 21, United States Code, Section 853(p), as
incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,

FOREPERSON



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 14-

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

PAUL MANCUSO,
a/k/a "PMan,"
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PASQUALE STISO,
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INDICTMENT FOR

18 U.S.C. § 1343

18 U.S.C. § 1349

18 U.S.C. § 2

A True Bill,

Foreperson

PAUL J. FISHMAN

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NEWARK, NEW JERSEY

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