

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 : Criminal No.
 v. :
 :
 SALVATORE PICCOLO : 18 U.S.C. §§ 1343 & 2
aka "Sam" : 21 U.S.C. § 841(a)(1)

INFORMATION

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

**COUNT ONE
(Wire Fraud)**

Background

1. At all times relevant to Count One of this Information:
 - a. Defendant SALVATORE PICCOLO was a resident of Atlantic City, New Jersey and Philadelphia, Pennsylvania.
 - b. Business 1 was a business located in Union Township, Union County, New Jersey. Business 1 accepted valuables, such as jewelry, diamonds and other precious stones, watches, gold and silver in various forms, as well as other items of value, to pledge as security for loans authorized by Business 1's owners. Business 1 also operated a check-cashing division that cashed checks of all variations, to include, among others, large business checks, salary checks and personal checks. As a consequence, it had available on location large sums of U.S. currency, on a routine basis. Access into the lobby of Business 1 was granted by either a buzzer being pressed, thereby unlocking the door, or the front door being opened manually.

c. "Victim Company 1," which was headquartered in St. Paul, Minnesota, provided commercial property and commercial general liability insurance to Business 1.

The Scheme to Defraud

2. From in or about April 19, 2014 through in or about November 2014, in Union County, in the District of New Jersey, and elsewhere, defendant

SALVATORE PICCOLO

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud Victim Company 1, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice was in substance as set forth below.

Goal of the Scheme to Defraud

3. The goal of the scheme and artifice to defraud was to fraudulently obtain money from Victim Company 1 by submitting a false insurance claim to Victim Company 1, prepared by the owner of Business 1, for inflated losses attributed to a staged armed robbery of Business 1 committed by SALVATORE PICCOLO and another.

Manner and Means of the Scheme

4. It was part of the scheme and artifice to defraud that defendant SALVATORE PICCOLO, and another, entered Business 1 to stage an armed robbery as a ploy to permit Business 1's Owner to submit a significantly inflated claim to Victim Company 1.

5. It was further a part of the scheme and artifice to defraud that Business 1's Owner submitted a fraudulent claim to Victim Company 1 for losses significantly higher than the cash and jewelry actually taken by defendant SALVATORE PICCOLO and another.

6. It was further part of the scheme and artifice to defraud that, between November 3, 2014 and November 13, 2014, Business 1 received, under false pretenses, \$174,025 from Victim Company 1, which was wire transferred from Victim Company 1's Citibank account to Business 1's bank account at Bank of America, in the District of New Jersey.

Execution of the Scheme

7. Between on or about November 3, 2014 and on or about November 13, 2014, in Union County, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute the scheme and artifice to defraud, defendant

SALVATORE PICCOLO

did knowingly and intentionally transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce writings, signs, signals, pictures, and sounds, namely, electronic wire transfers of funds from Victim Company 1's Citibank account in Minnesota to Business 1's

bank account at Bank of America in New Jersey.

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

COUNT TWO
(Distribution of a Controlled Substance)

On or about June 30, 2017, in Camden County, in the District of New Jersey and elsewhere, defendant

SALVATORE PICCOLO

did knowingly and intentionally distribute and possess with intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).


CRAIG CARPENITO
United States Attorney

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aka "Sam"**

INFORMATION FOR

**18 U.S.C. §§ 1343 & 2
21 U.S.C § 841(a)(1)**

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