
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT
v. : Mag No. 13-8083 (MCA)
PAUL MANCUSO and :
PASQUALE STISO, a/k/a :
"Pat Stiso" :


I, the undersigned complainant, 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, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.


Richard V. Sluszk, Special Agent
Federal Bureau of Investigation

Sworn to before me and
subscribed in my presence,

March 6, 2013, at 5:15pm
Newark, New Jersey

HON. MADELINE COX ARLEO
U.S. MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

From in or around 2009 to on or about March 5, 2013, in Bergen County, in the District of New Jersey, and elsewhere, defendants

PAUL MANCUSO and
PASQUALE STISO, a/k/a "Pat Stiso,"

knowingly and willfully 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 to do so by means of interstate wire communications, as described in Attachment B, contrary to Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1349.

ATTACHMENT B

I, Richard V. Sluszk, am a Special Agent of the Federal Bureau of Investigation. I have knowledge of the facts set forth herein through my personal participation in this investigation and through oral and written reports from other federal agents or other law enforcement officers. Where statements of others are set forth herein, these statements are related in substance and in part. Since this Criminal Complaint is being submitted for a limited purpose, I have not set forth every fact that I know or other law enforcement officers know concerning this investigation. I have only set forth those facts that I believe are sufficient to show probable cause exists to believe that the defendants have committed the offense set forth in Attachment A. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Criminal Complaint:

a. Defendant Paul Mancuso was a resident of Bergen County, New Jersey.

b. Defendant Pasquale Stiso, a/k/a "Pat Stiso" was a resident of Westchester County, New York.

2. During this investigation, federal agents applied for and obtained Court-ordered authorization to intercept wire and electronic communications occurring over a cellular telephone used by defendant Mancuso with a number ending in -2500 (hereinafter the "First Mancuso Target Facility"). Federal agents also applied for and obtained Court-ordered authorization to intercept wire communications over a cellular telephone used by defendant Mancuso with a number ending in -5400 (hereinafter the "Second Mancuso Target Facility").

3. Each of the telephone conversations excerpted below was lawfully recorded.

Overview of the Investigation

4. Based on information obtained during the course of the investigation, I have learned that defendant Mancuso and his co-conspirators, including defendant Stiso, are engaging in various schemes to defraud victims of substantial sums of money. From in or around 2009, defendant Mancuso has devised various schemes to defraud and has obtained money from numerous victims by means of materially false and fraudulent pretenses, representations, and promises. As set forth below, the investigation has revealed

that defendant Mancuso holds himself out as a real estate investor, broker, and/or developer, as well as a "hard money" lender and broker of other various purported investments, and that he obtains from his victims substantial investments for various projects that, in fact, either do not exist at all, or in which defendant Mancuso has no actual involvement. The investigation has revealed that defendant Stiso, a disbarred attorney, holds himself out as an individual who is working with defendant Mancuso on various purported projects.

5. Since in or around 2009, defendant Mancuso and his co-conspirators have defrauded in excess of fifteen victims of approximately \$5 million. Most, if not all, of defendant Mancuso's victims have lost all or substantially all of the money they invested with him and his co-conspirators. Many of defendant Mancuso's victims have lost all or substantially all of their life savings in his various schemes to defraud.

6. Defendant Mancuso and his co-conspirators spend their victims' money for their own personal benefit. The investigation has revealed that defendants Mancuso and Stiso are heavily involved in illegal gambling pursuits, and that they both owe substantial sums of money to one of their bookmakers or "bookies" (hereinafter referred to as "the Bookie"). Indeed, as described below, defendant Mancuso paid the Bookie in excess of \$600,000 from gambling losses in or around 2012, and defendant Mancuso still owes the Bookie approximately \$500,000 from gambling losses.

7. Since in or around 2009, defendant Mancuso has concocted a number of different fraudulent schemes by which he has obtained his victims' money by means of materially false and fraudulent pretenses, representations, and promises. Among others:

(a) Defendant Mancuso and defendant Stiso have recruited victims to invest in a ticket scheme. Specifically, defendants Mancuso and Stiso have falsely represented to victims that they purchase event tickets, such as tickets to sporting events and concerts, at a cut or wholesale rate, and then resell them to members of the public at an inflated rate, creating significant profits for their investors. In reality, the investigation has revealed that defendants Mancuso and Stiso did not buy tickets with their victims' money.

(b) Defendant Mancuso has also recruited victims to invest in a supposed pizzeria at a resort in the Bahamas. Specifically, defendant 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, the investigation has revealed that defendant Mancuso was not involved in either the purchase or development of any restaurants at a resort in the Bahamas.

(c) Defendant Mancuso has also recruited victims to invest in a residential real estate project in Florida. Specifically, defendant Mancuso falsely represented to victims that he was involved in a project to redevelop a residential apartment community in Florida. In reality, the investigation has revealed that defendant Mancuso was not involved in a residential real estate project in Florida.

(d) Defendant Mancuso has also 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. Defendant 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, the investigation has revealed that defendant Mancuso was not involved in the development of a casino in Atlantic City.

(e) Defendant Mancuso has also recruited victims to invest in the development of a commercial shopping center project. Defendant Mancuso alternately represented to victims that the shopping center was located in Connecticut or New York State. In reality, the investigation has revealed that defendant Mancuso was not involved in the development of a commercial shopping center in Connecticut, New York, or elsewhere.

(f) Defendant Mancuso and defendant Stiso have recruited victims to obtain "hard money" loans through them. Specifically, defendants Mancuso and Stiso falsely represented to victims that they could broker "hard money," or private, loans for a fee. Defendants Mancuso and Stiso promised victims that for a fee and with a significant, up-front deposit, they could obtain sizeable "hard money" loans.

(g) Defendant Mancuso and defendant Stiso also have recruited victims to invest in a purported real estate project in Matawan, New Jersey. Specifically, defendants 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, the investigation has revealed that defendants Mancuso and Stiso were not engaged in any such transaction.

8. Defendants Mancuso and Stiso used interstate wire communications to devise their schemes and artifices to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises. Details concerning some of their various schemes to defraud are set forth below.

The Ticket Scheme

9. The investigation has revealed at least two victims of the ticket scheme (hereinafter "Victim One" and "Victim Two"). According to Victim One, defendant Mancuso recruited Victim One to invest in the ticket scheme. According to Victim Two, defendants Mancuso and Stiso recruited Victim Two to invest in the ticket scheme. Both Victim One and Victim Two were informed that defendant Mancuso purchases event tickets, including tickets to sporting events and concerts, at a cut or wholesale rate, and then resells them to members of the public at an inflated rate. Defendant Mancuso promised Victim One significant profits if he/she invested in the tickets deal; both defendants Mancuso and Stiso promised Victim Two significant profits if he/she invested in the tickets deal. Both Victim One and Victim Two invested substantial sums of money in the tickets scheme. Both Victim One and Victim Two have lost their entire investments.

10. Defendant Mancuso directed Victim Two to make three wire transfers for his/her investment in the tickets deal. For one of the transfers, defendant Mancuso directed Victim Two to transfer \$75,000 to an account in the name of defendant Stiso.

11. On February 19, 2013, at approximately 17:55 hours, defendant Mancuso (PM) received an incoming telephone call from defendant Stiso (PS) over the First Mancuso Target Facility. The following conversation ensued, in substance and in part:

PS: [T]he two biggest things that really do stress me is the whole [Bookie] thing because of the lie [UI] so you can't tell me I'm f*****g making that up, that's just a bad lie and now on top of the lie, and I don't want to repeat what we spoke [UI] at length for Saturday evening when I really got my blood pressure up [UI]

telling you how bad this looks. And you know since the Super Bowl, it's one thing leaving a number there, it's another thing paying the number off at \$10,000 a month, it's certainly another thing when somebody keeps on calling [UI]- these guys are gonna come in, all right-

PM: All right [UI]-

PS: And the last thing is, and the last thing is when a guy like [Victim Two], all right, has a \$75,000 f*****g wire going into my account, so if you really want to know what's the two stressful things that I care about, those are the two stressful things that I care about.

12. Your Affiant submits that, based in part on other intercepted calls, when defendant Stiso referred to the "bad lie," it is believed that he is referring to a lie that defendant Mancuso told the Bookie; specifically, your Affiant submits that defendant Mancuso told the Bookie that he wired him money, in satisfaction of some of the gambling debt that defendant Mancuso owes the Bookie, when in reality, defendant Mancuso did not send a wire at all. Your Affiant submits that during this conversation, defendant Stiso told Mancuso that one of the main causes of stress in his life is the fact that defendant Mancuso lied to the Bookie, and that defendant Mancuso is not paying back his debts to the Bookie. Your Affiant also submits that according to defendant Stiso, the second main cause of stress in his life is the fact that Victim Two wired \$75,000 into defendant Stiso's bank account. As set forth above, Victim Two, in fact, wired \$75,000 into defendant Stiso's bank account as his/her investment in the tickets deal. Also as set forth above, the investigation has revealed that defendants Mancuso and Stiso did not buy tickets with their victims' money.

13. The investigation has also revealed other instances in which defendant Stiso expressed to defendant Mancuso that he was uncomfortable receiving money directly from other individuals. For example, on February 20, 2013, at approximately 17:26 hours, defendant Mancuso (PM) placed an outgoing call to defendant Stiso (PS) over the First Mancuso Target Facility. The following conversation ensued, in substance and in part:

PM: Now what?

PS: What do you think I'm f*****g nuts about right now?

PM: I don't have a clue. The only thing I could think of ... is, uh- uh- [Victim Two], because everybody else is.

PS: No, it's not. ...

PM: Cause I can't imagine one other thing outside of [Victim Two].

PS: There's nothing. Exactly right? So- so- this is- this is going to f*****g make- I got a check over-nighted to me today from [Individual One] made out to Stiso. Do you know how f*****g irate I am right now?

PM: Naw.

PS: Can you imagine? ... OK. Right now, I'm not giving that check to anybody. I'm not cashing that check ... I don't want money [voices overlap]. I don't want anybody-

PM: Here's [UI]- he didn't realize that probably, so just call him and tell him you're ripping it up and send another one. That's it.

PS: I don't want him to keep on going for the money, but I'm just telling him, you know what I mean- I- I. It makes me seem like a guy, I would- I would [voices overlap]- charge somebody going that's in jail twenty-five years.

14. Your Affiant submits that during this phone conversation, defendant Stiso informed defendant Mancuso that he had received a check made payable to himself personally (Stiso), which made him "irate." It is believed that Individual One may be a victim of defendants Mancuso and Stiso. Your Affiant also submits that during this phone conversation, defendant Stiso stated that his receipt of this check could get him "charge[d]" with something or that someone could go to jail for "twenty-five years" for doing that.

15. Additionally, as set forth below, an additional victim of the ticket scheme was also recruited by defendants Mancuso and Stiso to invest in the Matawan real estate scheme.

The Commercial Shopping Center Scheme

16. The investigation has revealed at least one victim of the commercial shopping center scheme (hereinafter "Victim Three") and one attempted victim of the commercial shopping center scheme (hereinafter "Victim Four"). According to Victim Three and Victim Four, defendant Mancuso recruited them to invest in the commercial shopping center scheme. According to Victim Four, defendant Mancuso alternately told him/her that the shopping center was located in Connecticut or New York State. Defendant Mancuso promised Victim Four significant profits if he/she invested in the commercial shopping center project. Victim Four declined to do so, although as set forth below, Victim Four had earlier invested in the Florida real estate scheme. Victim Three, however, invested substantial sums of money in the commercial shopping center project (along with numerous other purported projects). Victim Three has lost his/her entire investment in the commercial shopping center deal (and in every other purported deal in which he/she invested with defendant Mancuso).

17. On December 20, 2012, at approximately 18:15 hours, defendant Mancuso (PM) received an incoming telephone call from Victim Four over the Second Mancuso Target Facility. During that call, defendant Mancuso stated, in substance and in part: "Let me just explain to you what I really need and what I'm really due, OK? We don't need \$45,000, OK? We needed 35. OK? That's what we need- he is telling you 30, but 35, that's the real number, OK? If you could do the 35,000, this is what I'd do for you, OK. I'll, you know- I owe you- at that point you'll be owed 155, is that true?" Victim Four replied that it was. Defendant Mancuso then stated, in substance and in part: "Listen to what I will do. I, Paul Mancuso, will sign a promissory note with you for- for- for, at that point, uh, the 155- I will sign a promissory note with you for \$300,000. ... But I just don't have time to do the promissory note because at 8:00 in the morning and do all this, but I will do- like last time you asked me to sign something and send it overnight, I signed and sent it overnight. ... I will do anything you want me to do ..."

18. Later in the same conversation, defendant Mancuso stated, in substance and in part: "[The shopping center's] gonna be done, and I'm gonna have a deal in writing with a company. Now, right now I'm playing a game between [Retail Chain One], [Retail Chain Two], um, [Retail Chain Three], you know, I'm going for the biggest bidder, so I'm playing a game right now with these people, and I'm trying to get the biggest bidder."

19. Your Affiant submits that the investigation has revealed that defendant Mancuso was not involved in the development of a commercial shopping center in Connecticut, New York, or elsewhere, and defendant Mancuso has not been involved in negotiations or "games" with any retail chain stores either. Your Affiant also submits that defendant Mancuso's false representations to Victim Four were designed to induce Victim Four to invest an additional \$35,000 in the commercial shopping center project.

20. On February 13, 2013, at approximately 09:26 hours, defendant Mancuso (PM) made an outgoing call to Victim Three (V3) over the First Mancuso Target Facility. The following conversation ensued, in substance and in part:

PM: All right, um, today's an important day for us cause I'm sitting with the guy who wants to do [the commercial shopping center] with us. I'm making a reservat- I- I have a flight going out to Florida tomorrow morning.

V3: OK.

PM: I had to wait, I got a flight from Jet Blue over there to [UI] f*****g 104- 108 bucks, so. ...

21. Your Affiant submits that based in part on other intercepted calls, defendant Mancuso did not meet with anyone involved with a commercial shopping center project on February 13, 2013. Indeed, as set forth above, the investigation has revealed that defendant Mancuso was not involved in the development of a commercial shopping center. In addition, as set forth below, Victim Three also gave substantial sums of money to defendant Mancuso for a purported real estate project in Florida. Your Affiant submits that when defendant Mancuso mentioned flying to Florida to Victim Three, it was a likely reference to a business trip to Florida for the purported real estate project. According to pen register and trap and trace device data, defendant Mancuso was not in Florida at any point during the month of February 2013.

22. On February 14, 2013, at approximately 12:06 hours, defendant Mancuso (PM) made an outgoing call to Victim Three (V3) over the First Mancuso Target Facility. The following conversation ensued, in substance and in part:

V3: Yeah, anything good happen yesterday with the [commercial shopping center] guy?

PM: No, I am close to making a deal with this guy. He is supposed to be closing tomorrow on his [UI]. So, a lot of deals are coming together, you know. Just like you said. I have two weeks to wait for that other money, so it's all coming together.

23. Again, your Affiant submits that based in part on other intercepted calls, defendant Mancuso did not meet with anyone involved with a commercial shopping center project on February 13, 2013. Indeed, as set forth above, the investigation has revealed that defendant Mancuso was not involved in the development of a commercial shopping center, and he is not, therefore, "close to making a deal."

24. As set forth above, Victim Three invested - and lost - substantial sums of money with defendant Mancuso for a variety of purported projects, including, but not limited to, the commercial shopping center deal, the Florida real estate project, and the Atlantic City casino project. A review of various bank records has revealed that Victim Three sent substantial sums of money to defendant Mancuso, which then was withdrawn in cash and/or forwarded to other individuals, who then made cash withdrawals. For example, on or about June 14, 2011, Victim Three wired \$50,000 to an account in the name of defendant Mancuso, and referenced "Jersey Land Purchase" on the wire remarks. On that same date, June 14, 2011, defendant Mancuso withdrew \$31,000, apparently in cash. On that same date, Mancuso also transferred \$12,000 to an account in the name of Company One, a company controlled by Individual Two. The investigation has revealed that Individual Two is not involved in any real estate projects; rather, the investigation has revealed that, among other things, defendant Mancuso owes gambling debts to Individual Two. Also on that same date, June 14, 2011, Individual Two withdrew \$10,000 in cash. In other words, your Affiant submits that the \$50,000 wired by Victim Three to defendant Mancuso for a "land purchase" was used by defendant Mancuso and others for their own personal gain, including, likely, for illegal gambling pursuits.

The Florida Real Estate Scheme

25. The investigation has revealed at least three victims of the Florida real estate scheme, specifically, Victim Three, Victim Four, and a victim that will hereinafter be referred to as Victim Five. According to Victim Three, Victim Four, and Victim Five, defendant Mancuso recruited them to invest in the Florida real estate scheme. Defendant Mancuso promised them significant profits if they invested in the Florida real estate project, and they all invested substantial sums of money in the purported

deal. Victim Three, Victim Four, and Victim Five have lost their entire investments.

26. On December 20, 2012, at approximately 18:15 hours, defendant Mancuso (PM) received an incoming telephone call from Victim Four over the Second Mancuso Target Facility. During that call, defendant Mancuso stated, in substance and in part: "You know what? I closed the whole Florida deal, OK. How I did it, you have no idea, we'd have to sit down over wine and I'd explain it to you. But it took me a lot more money and a lot of s**t to get it closed but it's closed. That's one less problem that I have now. Now I get \$500,000 a year income."

27. The investigation has revealed, through an analysis of defendant Mancuso's bank and other financial records, that defendant Mancuso does not make \$500,000 a year in income from the proceeds of any such real estate deal in Florida. Indeed, the investigation has revealed that defendant Mancuso was not involved in a residential real estate project in Florida. Your Affiant submits that these representations are false, and that defendant Mancuso made these false representations to Victim Four in an attempt to bolster his image with Victim Four and induce Victim Four to give him more money, including, as discussed above, for the commercial shopping center deal.

28. On February 8, 2013, at approximately 14:34 hours, defendant Mancuso (PM) received an incoming call from Victim Three (V3) over the First Mancuso Target Facility. The following conversation ensued, in substance and in part:

PM: [Victim Three], what's up? I'm caught in a storm in f*****g Connecticut, what's up?

V3: Oh. Nothing's up. I was wondering what's with you.

PM: I- I'm trying to get this Florida thing done quicker but I can't go out there until after the storm, or I was supposed to go out there tomorrow, Sunday. And, everything is closing down up by us. ...

29. Your Affiant submits that despite defendant Mancuso's representation to Victim Four that he "closed" the Florida deal, during this conversation, defendant Mancuso represented to Victim Three that he was in Connecticut at the time of the call, and that he was "trying to get this Florida thing [deal] done." According to pen register and trap and trace device data, defendant Mancuso was not in Connecticut at the time of the call; he was in New Jersey. Also, as set forth above,

according to pen register and trap and trace device data, defendant Mancuso was not in Florida at all during the month of February 2013.

30. As set forth above, Victim Four invested - and lost - substantial sums of money with defendant Mancuso for the purported Florida real estate project. For example, a review of various bank records has revealed that on or about December 9, 2011, Victim Four wired \$80,000 to an account in the name of "P Man Enterprises," which is controlled by defendant Mancuso. On that same date, December 9, 2011, Mancuso withdrew \$40,000 from the account, apparently in cash. Also on that same date, December 9, 2011, Mancuso issued a check in the amount of \$27,000 to Company One, a company controlled by Individual Two. As stated above, the investigation has revealed that Individual Two is not involved in any real estate projects; rather, the investigation has revealed that, among other things, defendant Mancuso owes gambling debts to Individual Two. On December 12, 2011, Mancuso issued a check in the amount of \$13,000 to Company One. In other words, of the \$80,000 transferred on this occasion by Victim Four to defendant Mancuso's P Man Enterprises account, all of it was either withdrawn or transferred to Individual Two, who, again, is not believed to be involved in the real estate projects used by defendant Mancuso or his co-conspirators to attract victims. Rather, your Affiant submits that the \$80,000 wired by Victim Four to defendant Mancuso for the Florida real estate project was used by defendant Mancuso and others for their own personal gain, including, likely, for illegal gambling pursuits.

The Matawan Real Estate Scheme

31. As noted above, one victim of the ticket scheme was also recruited by defendants Mancuso and Stiso to invest in the Matawan real estate scheme (hereinafter "Victim Six"). On February 7, 2013, at approximately 09:18 hours, defendant Mancuso (PM) placed an outgoing call to Victim Six (V6) over the First Mancuso Target Facility. The following conversation ensued, in substance and in part:

V6: [H]ow we doing with some back ticket money?

PM: It's all gonna come together, everything is done now, so now I'm just waiting. I want to come and meet, you and I- want to sit with you alone, I want to meet ya
...

V6: How about- how you doing finding any other buildings- any other little buildings around or nothing?

PM: I got two things I'm interested in, but I think that the Matawan is your best deal right now because even if you ask your boy ... I'm- you're talking about, you know- I'm into this piece for, uh, \$1 million, and the appraisal is 2.5, I'm getting- I mean, we can build forty [units]. You know most of the work there is just f*****g digging out the basement and knocking the building down ... we can [UI]- I can get the money to you, build this, do everything, you can be into this piece for \$5 million and it's gonna be worth like 11-12 million.

32. Your Affiant submits that during this phone conversation, Victim Six inquired about the money he/she is owed from the ticket scheme, as well as about any other real estate projects in which defendant Mancuso was involved. Defendant Mancuso replied that he was involved in a real estate project in Matawan, New Jersey, and that he personally invested \$1 million into the project. Your Affiant further submits that defendant Mancuso told Victim Six that he intended to demolish a building on the property and that for a \$5 million investment by Victim Six, the property would be worth between \$11 million and \$12 million.

33. On February 20, 2013, at approximately 18:31 hours, defendant Mancuso (PM) placed an outgoing call to defendant Stiso (PS) over the First Mancuso Target Facility. The following conversation ensued, in substance and in part:

PS: If you guys help, help, you know- me deliver on this, there's, ya know, there's- there's a commission broken in. However you decide to say it. All right?

PM: All right. I got ya.

PS: Just don't play it up too stupid.

PM: No, no, I know. I'm ready to play everything tomorrow.

PS: OK, all right.

PM: I'm ready to play a complete- a full, a full game.

PS: You gotta play a full game tomorrow.

PM: All right. I'm ready with ya.

34. Your Affiant submits that, as set forth below, defendant Mancuso and defendant Stiso discussed a meeting scheduled for the next day, February 21, 2013, with Victim Six in connection with the Matawan real estate scheme, and the "game" that defendants Mancuso and Stiso agreed that defendant Mancuso would "play" with Victim Six the following day.

35. The next day, February 21, 2013, at approximately 08:54 hours, defendant Mancuso (PM) placed an outgoing call to Individual Three (I3) (whose name is not Ralph) over the First Mancuso Target Facility. The following conversation ensued, in substance and in part:

PM: All right, this is what I need you to do. Ready?

I3: Yeah.

PM: When I beep you in about twenty minutes, right, when I beep you, call back my phone, all right? And this is what I need you to say. Say, hey, what's up Paul, it's Ralph. You know, I just got into Florida. I can't talk right now, but I'm gonna sit with Lon in a little while and we should have this hedge fund deal, you know, done, within the next seven days. You know, sound professional. And then I'm gonna say to you, well, what- what number, you go- you'll be- just, I'm gonna say what number? Hey listen, you're gonna be happy, just bear with me for another seven days cause I'm going to Texas on Saturday, that's it- let me tell you what I'm trying to do, uh-uh- hold on one sec, what I'm trying to do, remember the deal I told you about I was trying to do with the big shot? I was saying I wanted you to come with me?

I3: Yeah.

PM: OK, well, I have a letter of intent. I have a lawyer that's gonna be in the car with me, that's all put together. I have a letter of intent. I have a commitment. I got everything. So unless something goes wrong, I'm 90% sure that the deal will go down. If the deal goes down, I get like a \$475,000 commission. What I'm trying to do today is just to get the guy to give me \$20,000 up front. He gives me the 20 up front, I'll give you \$2,000 for your pocket. ... So, uh- uh- I'm gonna text you, you're gonna call back,

just remember the name, you're Ralph, say, hey what's up, Paul, it's Ralph. Say, I just landed in Florida, I'm going to meet Lon, um, your hedge fund deal will be finalized within the next seven days and you're gonna be very happy, I'm flying out to Texas tomorrow, you know.

I3: I'm flying- I'm flying where tomorrow?

PM: From Florida to Texas.

I3: OK.

PM: OK. And then I'll- I'm gonna say, then, then thank me for the football tickets I gave you for the Super Bowl.

I3: All right. So seven days, I'm going to Texas tomorrow, and thank you for the Super Bowl tix [ph].

PM: Yeah, then- then- then say we had a good time, say, um, then say to me, ah- listen- then- no- then- I'll say how, what's the worst case scenario with the hedge fund? And you say, I would say the worst case scenario is about two weeks, you say, say thirty days but it should be happening, and it should be done within two weeks, and then I'll say thank you very much and you know, you know what to do, but just sound professional like you're a legitimate hedge fund guy, you know? ...

I3: All right. I'll be in town, I'm leaving for Texas tomorrow morning, um, blah-blah-blah, then I also wanted to thank you for the Super Bowl tickets, we had a really great time, uh, you know, it's been a pleasure working with you, and- and moving forward, I see a lot of great things between us.

PM: Uh, that's beautiful. Perfect. OK, then- then- what I'll do is I'll text you, you call me back, then when I'm done with this guy, I'll call you, we're driving to Connecticut to get deposits, that's what we're doing.

36. Your Affiant submits that during this phone conversation, defendant Mancuso coached Individual Three on how to pretend to be "Ralph," a "legitimate hedge fund guy." Your Affiant also submits that defendant Mancuso also coached Individual Three that "Ralph" should tell defendant Mancuso and "the lawyer that's gonna be in the car with [defendant Mancuso]" that the "hedge fund deal will be finalized within the next seven

days." Your Affiant further submits that defendant Mancuso instructed Individual Three to make these false and fraudulent representations in order to help defendant Mancuso close a "deal" that would earn him a "\$475,000 commission." In exchange for making these false and fraudulent representations, defendant Mancuso offered Individual Three \$2,000 in cash. The investigation has revealed that at the time this phone call was placed, defendant Mancuso was en route to a meeting with Victim Six to discuss the Matawan real estate project. Your Affiant also submits that this is the "game" that defendants Mancuso and Stiso agreed the prior day that defendant Mancuso would "play" with Victim Six the following day.

37. Approximately forty minutes later, on February 21, 2013, at approximately 09:34 hours, defendant Mancuso (PM) received an incoming call from Individual Three over the First Mancuso Target Facility. During that phone conversation, Individual Three stated, in substance and in part, among other things: that his name was Ralph; that he had just arrived in Florida; that he was traveling to Texas the next day; that he was "hoping we get it all wrapped up within fourteen days, you know, but, you know, there's a chance we may go thirty days;" and that "you'll be really impressed with the results."

Gambling Debts

38. As stated, the investigation has revealed that defendants Mancuso and Stiso are heavily involved in illegal gambling pursuits, and that they both owe substantial sums of money to the Bookie. As set forth below, defendant Mancuso paid the Bookie in excess of \$600,000 in gambling losses in or around 2012, and defendant Mancuso still owes the Bookie approximately \$500,000 from gambling losses.

39. On February 3, 2013, at approximately 11:21 hours, defendant Mancuso (PM) made an outgoing call to the Bookie over the First Mancuso Target Facility. During that conversation, the Bookie told defendant Mancuso, in substance and in part, that defendant Mancuso owed him "575," which, your Affiant submits, is a reference to \$575,000. The Bookie also reminded defendant Mancuso that he promised to pay the Bookie "175," which, your Affiant submits, is a reference to \$175,000, by that Friday.

40. On February 8, 2013, at approximately 17:49 hours, defendant Mancuso (PM) received an incoming call from defendant Stiso (PS) over the Second Mancuso Target Facility. The following conversation ensued, in substance and in part:

PM: [M]y conscience is f****d up with everybody but this guy [the Bookie]. He took 600,000, I paid this kid [the Bookie], so my conscience is, you know- he's the only kid ahead of the game, OK. So my conscience is not f****d up with him. Maybe I have a conscience with [Victim Two] and other situations, and I would make those things 110% right, OK. But my conscience with [the Bookie] is not f****d up because what I did to get him the 600-650 is what put me in these bad positions. ... Listen, [the Bookie], whatever his name is, got paid from me almost 600 grand in cash. I have every figure written down from the 60 with [Victim Six], the other 60 with [Victim Six], from the wires, the transfers, the cash. He got paid, paid, P-A-I-D, 600 in cash, OK. I have every number written down going back to February of last year, OK. Every number I have written down, OK. He got paid \$612,000 in green. The only thing that I count is green that goes back and forth. Not me winning, not him losing, not me owing, not him owing, OK. I only count the money that's been- money that he gave me- was 6,000 1's and 17 1's. The actual passing of green money. Green. So he's ahead of the game 612. So, I don't have a conscience for him. For everybody else, I do have a conscience.

41. Your Affiant submits that during this conversation, defendant Mancuso told defendant Stiso that he has paid \$612,000 "in green," or cash, to the Bookie "going back to February of last year," or February 2012. The investigation has revealed that defendants Mancuso and Stiso have received substantial sums of money from their victims since February 2012, much of which was withdrawn in cash after it was wired by the victims to particular bank accounts controlled by the defendants and their co-conspirators, as directed by defendant Mancuso.

Suspected Detection by Law Enforcement

42. Starting on or about February 27, 2013, defendant Mancuso and defendant Stiso began to suspect that they were the focus of a federal criminal investigation. On February 28, 2013, at approximately 16:16 hours, defendant Mancuso (PM) placed an outgoing call to defendant Stiso (PS) over the Second Mancuso Target Facility. The following conversation ensued, in substance and in part:

PM: I'm just a nervous wreck right now, you know what I'm saying?

PS: You could be a nervous- you could be a nervous wreck, and I could understand that. No one wants to be in your position. Me, just knowing you, doing- doing business with you, I don't want to be in this position. All right? But what I'm trying to say is that these other positions that you find yourself in, and that you think about lying and keep on doing it, there's gonna come a point in time when the lying is gonna catch up with you. All right?

43. On March 1, 2013, at approximately 09:16 hours, defendant Mancuso placed an outgoing call to Individual Four over the First Mancuso Target Facility. During that conversation, defendant Mancuso told Individual Four that he felt he was being investigated for "a whole f*****g bulls**t Ponzi thing" involving "a couple a million dollars," which, according to defendant Mancuso, was "like a one, two year charge."