# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA	:
	: Hon. Cathy L. Waldor
v.	
	: Mag. No. 14-7249 (CLW)
JOHN GROSSO	:
	: <u>CRIMINAL COMPLAINT</u>

I, Karen Veltri, 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 with 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.

Karen Vettri Special Agent Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence on the 13th day of November, 2014 at Newark, New Jersey

HONORABLE CATHY L. WALDOR UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

### ATTACHMENT A

# <u>Count 1</u> (Conspiracy to Obstruct Commerce by Extortion Under Color of Official Right)

From in or about November 2013 to in or about December 2013, in Essex County, in the District of New Jersey, and elsewhere, defendant

#### JOHN GROSSO

and others did knowingly and intentionally conspire to obstruct, delay, and affect interstate commerce by extortion under color of official right, by accepting and agreeing to accept a corrupt payment that was paid by another, with that person's consent, in exchange for defendant JOHN GROSSO's official action and assistance in violation of his official duties at the Essex County Correctional Facility as specific opportunities arose.

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

# ATTACHMENT B

I, Karen Veltri, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have personally participated in this investigation and am aware of the facts contained herein based upon my own participation in this investigation, interviews and briefings with other law enforcement officers and interviews and briefings with confidential sources of information and witnesses. I also have reviewed publicly-available documents and reports, and other evidence, including telephone toll records and cell-site data. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not set forth herein each and every fact that I know concerning this investigation. 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. All referenced times are approximate and refer to Eastern Standard Time.

- 1. At times relevant to this complaint:
  - a. Defendant JOHN GROSSO ("GROSSO") was a Corrections Officer at the Essex County Jail. GROSSO utilized a cellular telephone (the "Grosso Phone").
  - b. The Essex County Jail was a facility in Newark, New Jersey, that held federal pretrial detainees by direction of or pursuant to a contract or agreement with the United States Attorney General.
  - c. There was a cooperating witness ("CW-1") incarcerated at the Essex County Jail. CW-1 has cooperated with law enforcement in the hopes of obtaining a more favorable outcome with respect to pending federal criminal charges.
  - d. There was a cooperating witness ("CW-2"). CW-2 has cooperated with law enforcement in the hopes of obtaining a more favorable outcome with respect to anticipated federal criminal charges. CW-2 used a cellular telephone (the "CW-2 Phone").

2. According to CW-1, on multiple occasions during November 2013 and December 2013, GROSSO smuggled cellular telephones and cigarettes to CW-1 at the Essex County Jail in exchange for cash bribes. On those occasions, CW-1 asked CW-2 to gather the contraband and deliver the contraband and cash payments to GROSSO.

3. According to CW-2, CW-2 met with an individual at a Best Buy store in Secaucus, New Jersey, on multiple occasions at the direction of CW-1 for the purpose of facilitating this contraband smuggling and bribery scheme. The individual described by CW-2 – a young-looking white male who was married – matches the description of GROSSO. On each occasion, CW-2 handed this individual a cash bribe of approximately \$1,000, and contraband, including a cellular telephone and cigarettes. GROSSO subsequently delivered the contraband to CW-1 inside the Essex County Jail, according to CW-1. 4. An analysis of toll records for the Grosso Phone and the CW-2 Phone indicates that the Grosso Phone communicated with the CW-2 Phone on December 28, 2013, at 8:32 PM, 8:55 PM, and 9:00 PM.

5. An analysis of historical cell-site data associated with the Grosso Phone and the CW-2 Phone indicates that on December 28, 2013, the Grosso Phone and the CW-2 Phone were in the vicinity of the Best Buy in Secaucus, New Jersey, around the times of the three telephone calls referenced above.

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