SUPERIOR COURT OF N.J. FILED	SUPERIOR COURT	OF NEW JERSEY CRIMINAL
MOV 02 2007	State Grand Ju Number <u>S</u> Superior Court Docket Number	SGJ 545-07-9
STATE OF NEW JERSEY	)	
v.	)	INDICTMENT

VINCENT FILIPELLI

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

#### COUNT ONE

(Conspiracy - Third Degree)

#### VINCENT FILIPELLI

and other persons whose identities are both known and unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about August 1, 2005, and on or about October 24, 2006, at the Township of Cherry Hill, and at the Township of Waterford, both in the County of Camden, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of promoting gambling and possession of gambling records, did agree that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes, or

- B. One or more of them would aid in the planning, solicitation or commission of the aforesaid crimes, that is:
- 1. Promoting gambling, that is, to accept or receive money or other property pursuant to an agreement or understanding with any person whereby they participated or would participate in the proceeds of gambling activity, or would engage in conduct which materially aided said gambling activity by engaging in bookmaking to the extent that they would receive or accept in any one day more than five bets totaling more than \$1,000, contrary to the provisions of N.J.S.A. 2C:37-2; and
- 2. Possession of Gambling Records, that is, directly or indirectly, with knowledge of the contents thereof, to possess any writing, paper, instrument or article of a kind commonly used in the operation or promotion of a bookmaking scheme or enterprise, constituting, reflecting or representing more than five bets totaling more than \$1,000, contrary to the provisions of N.J.S.A. 2C:37-3.

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following overt acts, among others, were committed:

#### OVERT ACTS

1. On or about March 14, 2006, at the Township of Cherry Hill, in the County of Camden, VINCENT FILIPELLI did accept U.S.

currency as payment from a bettor for lost wagers that were placed on sporting events.

2. On or about October 24, 2006, at the Township of Cherry Hill, in the County of Camden, VINCENT FILIPELLI did possess written records reflecting the acceptance of wagers on sporting events.

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

#### COUNT TWO

### (Promoting Gambling - Third Degree)

#### VINCENT FILIPELLI

between on or about August 1, 2005, and on or about October 24, 2006, at the Township of Cherry Hill, and at the Township of Waterford, both in the County of Camden, in the County of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did promote gambling by knowingly accepting or receiving money or property, pursuant to an agreement or understanding with any person whereby the said VINCENT FILIPELLI did participate or would participate in the proceeds of gambling activity, or did engage in conduct which materially aided the said gambling activity, the said conduct being directed toward the arrangement of the financial and recording phases thereof, by engaging in bookmaking to the extent that he received or accepted in any one day more than five bets totaling more than \$1,000.00, contrary to the provisions of N.J.S.A. 2C:37-2 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

#### COUNT THREE

## (Possession of Gambling Records - Third Degree) VINCENT FILIPELLI

on or about October 24, 2006, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, with knowledge of the contents thereof, did possess writings, papers, instruments or articles of a kind commonly used in the operation or promotion of a bookmaking scheme or enterprise which constituting, reflecting or representing more than five bets totaling more than \$1,000.00, contrary to the provisions of N.J.S.A. 2C:37-3, and against the peace of this State, the government and dignity of the same.

#### COUNT FOUR

### (Possession of a Controlled Dangerous Substance - Third Degree)

#### VINCENT FILIPELLI

on or about October 24, 2006, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did possess controlled dangerous substances, that is, Methandrostenolone, Stanozolol, or Testosterone Propionate, all Schedule III controlled dangerous substances, contrary to the provision of N.J.S.A. 2C:35-10a(1), and against the peace of this State, the government and dignity of the same.

#### COUNT FIVE

#### (Money Laundering - Third Degree)

#### VINCENT FILIPELLI

between on or about August 1, 2005, and on or about October 24, 2006, at the Township of Cherry Hill, and at the Township of Waterford, both in the County of Camden, elsewhere, and within the jurisdiction of this Court, did commit the offense of money laundering, in that VINCENT FILIPELLI did transport or possess property known or which a reasonable person would believe to be derived from criminal activity, that is, the said VINCENT FILIPELLI did transport or possess U.S. currency, in an amount less than \$75,000, said U.S. currency being derived from his participation in illegal bookmaking activities, contrary to the provisions of N.J.S.A. 2C:21-25a, and against the peace of this State, the government and dignity of the same.

#### COUNT SIX

#### (Prohibited Devices - Fourth Degree)

#### VINCENT FILIPELLI

on or about October 24, 2006, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a stun gun, that is, a Muscle Man 100,000 volt Stun-Gun, or a Sabre 500,000 Volt Stun-Gun, contrary to the provisions of N.J.S.A. 2C:39-3h, and against the peace of this State, the government and dignity of the same.

#### COUNT SEVEN

(Prohibited Devices - Fourth Degree)

#### VINCENT FILIPELLI

on or about October 24, 2006, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did possess a 12" Billy Club, a 10" Billy Club, or a 5" Dagger Knife, without any explainable lawful purpose, contrary to the provisions of N.J.S.A. 2C:39-3e, and against the peace of this State, the government and dignity of the same.

#### COUNT EIGHT

(Possession of a Weapon by a Convicted Person - Fourth degree)

#### VINCENT FILIPELLI

on or about October 24, 2006, at the Township of Cherry Hill, in the County of Camden, elsewhere, and within the jurisdiction of this Court, having been convicted of the crime of Conspiracy to Commit Racketeering through acts of Extortion, on Federal Indictment Number 94-CR 00127-17 in the Eastern District of Pennsylvania, did possess or control a Muscle Man 100,000 volt Stun-Gun, a Sabre 500,000 volt Stun-Gun, a 12" Billy Club, a 10" Billy Club, or a 5" Dagger Knife, contrary to the provisions of N.J.S.A. 2C:39-7a and N.J.S.A. 2C:39-7c, and against the peace of this State, the government and dignity of the same.

AAG Gregory A. Paw, Director Division of Criminal Justice

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# SUPERIOR COURT OF N.J.

NOV 0 2 2007

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury
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Number SGJ545-07-9

Superior Court

07-11-00150-S Docket Number \_

STATE OF NEW JERSEY

ORDER OF VENUE

VINCENT FILIPELLI

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 2nd day of November, 2007, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Camden be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Camden for filing.

> J.S.C. Neil H. Shuster,