POLICE CASE NO. 2008-08281		The	State of	New Jersey	W400599
COURT Superior		Defendant / Alias Nun	11. zio Lagrass		
COUNTY OF Hudson / Morris	N.I	Address 250 Ridg			
COURT CODE NUMBER		City, State_Florham		[8	SS No.
COURT DOCKET NUMBER(S)		Date of birth 11/06/			
		Date of Dirth	100	Date of arrest	
Number of co-defendants	Dr. Lic.	#		SBI No	•
Complainant: <u>Det. Brian</u>	Protect	COMPLAI			
· ·	(NAME OF COMPLAINANT)			Of Criminal Just	PRESENTED) best of (his) (her) knowledge
	TIVE, Whippany, Noness of PRIVATE, CITIZEN COMPLAINANT)		,	Information and belief, the na	amed defendant on or about the
20.4	jurisdiction of t		ommit the o		County ofN,J
take or wit ILA obtain for the tak or associat	y and unlawfully hold action as an ang directly and i ting or withholding of those memb	official, spedirectly throug of official ers, in violat	cifically to ghothersmother details action relation of NJS	by as a union off onetary payments ated to the union 2C:2O-5/NJS2C:2-	icial of the from ILA members employment 6 - second degree
wit United violate a c deriv a ber position to vilating a	jurisdiction of t States currency a luty of fidelity t sefit, specificall solicit and acceduty of fidelity, of NJS 2C:21-10/NJ	s consideration on which he was y by Nunzio La pt monies from and thereby d	n for knowi subject as Grasso's us ILA member eriving a b	ingly violating o s a labor officia se of his ILA uni ss as considerati	r agreeing to l and thereby on official on for knowingly
Charge Number 1	Charge	Number 2	red	Charge Number 3	Markel
N.J.S. NJS 2C:20-5 Charge Number 1 As Amended	5/NJS 2C:2-6 N.J.S. N	IJS 2C:21-10/NJ Jumber 2 As Amended	S 2C:2-6	N.J.S.	ffichet
N.J.S.	N.J.S.	number 2 As Amended		Charge Number 3 As Af	mentled A
Signed	ed and sworn to before me		day of	ex This	(14).
To any peace officer or other au	PERSON ADMINISTERING OATH)	2	gned	COMPLAINANT	endant and bring (him) (hor)
Bell has been fixed by			A		by Conditions of release, e.g. R.O.R)
Court Appearance Date	COURT ACTION (Wh	Arolin iudiamont o	- ffl	SIGNATURE OF JUDGE	OR CLERK
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Number		The same of said		30 July	
Number		1.0			
Number					
ATE	otal DEDR Penalty Amount:			Crimes Penalty Amount:	
OFFENDANT DISCHARGED AS TO PROBABLE CAUSE PROSECUTOR ON PRIOR NOTICE.	Total Lab Fee	Restitution	DL. Susp.	Institution to Which Sentenced	
COMPLAINT REFERRED TO PROSECUTOR.	Community Service C	onditional Disch, Fee	·	JAIL TIME CREDIT	
OTHER (specify)	· ·				
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NONE STATE	PROSECUTING ATTO	RNEY AND DEFEN	ISE COUNSE!		LASSONER
ROSECUTING FTORMEY	2 9	DEFENSE COUNSEL 5	NUR	AEYAINED PUBLIC DEFENDER	ASSIGNED OTHER
ist Companion CDR numbers (Including	MISO Co-defendants).	CELLANEOUS INF	ORMATION		
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COURT US U	8281		V	us.		. 11700
Super	rior		الفا Defendant / Allea D	occo Ferrandin		
COUNTY OF	CLOF		Derendant / Aliastu	eco recramon		
	on / Morris	N.J.	Address 5 Silve	erside Road	lec	S No.
COURT CODE NUMBER			7 _1	.a mr	3	5 NO.
COURT DOCKET NUMBER(S)		·(City, State <u>Lakewoo</u>	U, IVJ	· · ·	
C-		2 2 2	Date of birth 02/2		of arrest	
Number of co-defend	ants	Dr. Lic.	#		SBI No.	<u> </u>
			COMPLA	NT		
	Det. Brian 1	Bruton			vision of Crim	inal Justi
Ompianiani.		(NAME OF COMPLAINANT)	· ·	(IDE	NTIFY DEPARTMENT OR AGENCY REF Oath says that, to the	PRESENTED)
Residing at One	Apollo Dr (ADDRESS	Whippany NJ 07	7981		nation and belief, the na	
day of	. 19	, in the of			MUNICIPAL CODE NO.	County of
lid;	, , ,	· .		•	* **)
within the j	urisdiction	of this Court	, committed t	he offense of	theft by extor	tion by
purposely an	d unlawfull	y obtaining the	e property of	another by thr	eatening to ta	ke or
		fficial, speci				
obtaining di	rectly and :	indirectly thro f official acti	ough other mon	tary payments	irom ILA memb	ers for th
those member	s. in viola	tion of NJS 2C:	:20-5/ NJS 2C:	2-6. a/Orime-o	f the second of	egree
			•		KITERLY M	U (INKIO).
within the j	juridiction	of this Court,	unlawfully di	d Solicit and	accept a penet	71 t
to Wit Unite	ed States Cu	rrency as a controller in violat:	nsideration fo	r knowingly vi	olating or agr	reeing 7
subject to a	is a labor o	official and the	ing a duty of ereby derive a	herefit spec	ich the other	was
Nunzio Lagra	isso in usin	ig his ILA union	n official pos	ition to solic	it and accent	_
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and thereby	deriving a	benefit in exce	ess of \$1000,	in violation o)/NJS
		third degree			Charge Number 3	
N.J.S. NJS 2C: Charge Number 1 A		N.J.S.]	NJS 2C:21-10/N Number 2 As Amended	JS 2C:2-6	N.J.S. Charge Number 3 As A	mended
- · •	o America	N.J.S.	Transport Lyng / Intollage		N.J.S.)
N.J.S.						
N.J.S.	Subscribed	and sworn to before me	this O	day of C	2-11-1	oll.
N.J.S.	Subscribed	and sworn to before me	this	day of	affer y	7
Signed	(NAME AND TITLE OF PER	RSON ADMINISTERING OATH)		Signed	COMPLANIAN	
Signed To any peace office	(NAME AND TITLE OF PER	and sworn to before me		Signed	COMPLANIAN	
Signed	(NAME AND TITLE OF PER	RSON ADMINISTERING OATH)		Signed	COMPLANIAN	
Signed To any peace office	(NAME AND TITLE OF PER	rson administering oath) rized person: Pursuant t		Signed	(COMPLANA) o arrest the named del	Tendant and brin
Signed To any peace office forthwith before this	(NAME AND TITLE OF PER	rson administering oath) rized person: Pursuant t		Signed	(COMPLANA) o arrest the named del	Tendant and brin
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COUNTY				N.J.	ieridant / Alias .	TIECHT THE	LLIG						
COURT CODE	idson / M	Morris		Ad	dress <u>150 S</u>	outh 25	th Stre	et		Iss	No		
		<u> </u>		Cit	y, State Keni	lworth,	New Je	rsev		33	IVO.	*	
COURT DOCK	:T NUMBER(8)		4.4	1.7	•								
IC-		 		Da	te of birth 06	/19/19/	1	_ Date of arr	est				
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Number of	co-defendant	8	•	Dr. Lic. #						_SBI No		· · · · · · · · · · · · · · · · · · ·	
	Dot	Davis Dav		. :	COME	PLAINT							å.
Complaine	nt: Det.	Brian Br	(NAME OF COMPLAIR	(ANT)		of NJ D	ivision		ARTMENT O	R AGENCY REPRE	SENTED)		
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did;	_day of	, 19	, in the	of						co	unty of		N.J.
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N.J.S.		., 		N.J.S.				N.J.St		2			
	Δ	Subscriber	d and sworn to	before me thi	s	/	day of	lp.	//	, 19	10	<u>2</u> .	
Signed	N/	11/1/1	PERSON ADMINISTERS	De		Signed		1	(1		•	
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DATE / /	AMOU	NT BAAL SET	REE: ON BAIL	R-0-8	BAIL INFO		N PLACE COMMITTED			· · · · · · · · · · · · · · · · · · ·			
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PROSECUTING ATTORNEY		STATE		,				RETAR 1	. 2	DEFENDER	ASSIGNED	OTHER	
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Defendent / Mass _ JOSEPH Quel 1. Superior COUNTY OF County of Hall New Jersey SS No. CO- Date of both Oslo					
SOURT SUPPORT COUNTY OF CO	POLICE CASE NO. 2008–08281		he State of I	New Jersey	W400597
COUNTY OF MALES AND CONTRACTION (Wherein lands and control of the county	COURT		us.		
Address 2808 Concord Drive Out State Mail 1, New Jersey Date of District Occidentations C— Dri Lie F COMPLAINT ON Division of Criminal Justice Description of	Superior S	Defendant / Alias	Joseph Oueli		
Address 2008 Cencord Prive Composer Name of the Co					
Complainant Det. Brian Bruton On Lie # Sun Mo. Complainant Det. Brian Bruton On NJ Division of Criminal Justice Forest conduction forest conduction on NJ Division of Criminal Justice Forest conduction forest conduction on NJ Division of Criminal Justice Forest conduction forest conduction on NJ Division of Criminal Justice Forest conduction f	HUCISON / Morris	Address <u>2808</u>	Concord Drive		
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Date of Only Drive Date of Only Drive Date of Armanda Det. Brian Bruton	COURT DOCKET NUMBER(S)	City, State Wall	, New Jersey		<u> </u>
COMPLAINT On My Division of Criminal Justice Description at One Apollo. Drive Description State of the Complete State of the Compl	<u>C</u> -	Date of birth 09	/06/1946	ate of arrest	·····
COMPLAINT On My Division of Criminal Justice Description at One Apollo. Drive Description State of the Complete State of the Compl	Number of co-defendants	Dr. Lic. #		CDI No.	
Desiding at One_Apollo_Drive_Winjearry_NI_O7981 day of	_	and the second s	LAINT		
Lessing at One_Apollo_Prive_Norman Norman No	Complainant: Det. Brian Bruton	With Augus	of NJ Division o	f Criminal Justi	ce
day of 19 in the of County		www.posterial	Upo	DENTIFY DEPARTMENT OR AGENCY REP On oath says that, to the	best of (his) (her) knowledge
thin the jurisdiction of this Court, without being authorized or permitted by law to do , loan directly or indirectly money in various amounts at a rate exceeding the maximum ate permitted by law or collecting monies as interest on said loans, specifically by tending loans and collecting interest at rates between 78 and 156% per year and fullecting monies as payment for said interest, in violation of NUSA 20:21-19/NUSA 20:26-6 tithin the jurisdiction of this Court, did knowingly transport or possess property known or inch a reasonable person would believe to be derived from criminal activity or did engage in a transaction involving such property with the intent to facilitate or promote the instinal activity, specifically by collecing U.S. Currency as payment for the interest on purious loans in violation of NUSA 20: 21-25/NUSACC: 2-6 These Number 1 As Amended Charge Number 2 As Amended Charge Number 2 As Amended Charge Number 3 As Amended Charge Number 4 As Amended Charge Number 3 As Amended Charge Number 3 As Amended Charge Number 4 As Amended Charge Number 4 As Amended Charge Number 6 As Amended Charge Number 6 As Amended Charge Number 6 As Amended Charge Number 7 As Amended Charge Number 8 As Amended Charge Number 8 As Amended Charge Number 9 As Amended Charge Number 9 As Amended Charge Number 9 As Amended Charge Number 1 As Amended Charge Number 8 As Amended Charge Number 9 As Amended Charge Number 9 As Amended Charge Number 1 As Amended Charge Number 1 As Amended Charge Number 8 As Amended Charge Number 9 As Amended Charge Number 9 As Amended Charge Number 9 As Amended Charge Number 1 As Amended Charge Number 1 As Amended Charge Number 1 As Amended Charge Number 9 As Amended Charge Number 1 As A	day of, 19, in the	and the second s	,	MUNICIPAL CODE NO.	
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STATE OF NEW JERSEY) SS.

AFFIDAVIT IN SUPPORT OF ARREST

COUNTY OF HUDSON

I, Brian Bruton, of full age, being duly sworn upon my oath, deposes and says:

- I am a detective employed by the New Jersey Attorney General's Office Division of Criminal Justice, Gangs-Organized Crime Unit. As such, I am a law enforcement officer empowered to conduct investigations of and make arrests for all criminal violations of the State of New Jersey.
- 2. Since on or about February 2009, members of this agency, along with law enforcement members of the Waterfront Commission have actively participated in an investigation concerning the criminal activities of an unlawful enterprise operating within and throughout the ports of the New Jersey and New York waterfronts. I am the detective principally responsible for the investigation.
- 3. A confidential informant [CI] who has given reliable information subject to independent corroboration, provided information regarding an illegal payment scheme being conducted by the enterprise that is the focus of this investigation. The CI advised that he/she has first hand knowledge of and interaction with other members of the enterprise participating in the scheme. According to the CI, the illicit scheme operated by those managing the enterprise required certain employees of the International Longshoreman's Association [ILA] at the port of New Jersey to make a yearly monetary payment to ILA union officials on behalf of and for the benefit of the enterprise. The CI advised this yearly payment is directly related to the actions the ILA union officials would take affecting the favorable labor treatment of the ILA members making the payments; including but not limited to maintaining or improving working positions and overtime availability.
- 4. The CI stated he/she first received a Container Royalty Check¹ several years ago, at which time he/she was directed by Nunzio LaGrasso to pay a portion of those monies [several hundred dollars] to him [LaGrasso]. The CI stated he paid those monies directly to LaGrasso. The CI initially asked LaGrasso why he had to pay, to which LaGrasso purportedly told the CI, "this isn't my money." The CI understood that to mean LaGrasso was collecting monies on behalf of some other individual/entity which I believe based upon my training and experience, was the enterprise that is also the subject of this investigation. The CI further advised that LaGrasso told him/her the payment was for favorable labor treatment, which the CI understood to mean preferable shifts, overtime, etc. The CI also related it was his understanding at that time that "everyone" at the port was making similar payment.

¹ I know from this investigation that a Container Royalty Check is an annual payment received by ILA members much like a "bonus" that is tied generally to the level of commercial activity at the Port for the given year along with ILA seniority.

- 5. The CI stated he/she continued to pay a portion of the Container Royalty Check in the next year indirectly to LaGrasso through another ILA member. The year thereafter, the CI stated once again he/she made the payment directly to LaGrasso at the union hall of Local 1478-2, located at 30 Hennessey Street, Newark, and he/she also brought with him the Container Royalty payments of two other ILA members that he had given to LaGrasso.
- 6. The CI advised in 2008, he made his payment indirectly to LaGrasso through another ILA member, Rocco Ferrandino - - a timekeeper at Maher Terminal in Port Newark/Elizabeth. Subsequent to the CI providing the monies to Ferrandino to deliver to LaGrasso, the CI and Ferrandino had a conversation concerning the payment. This conversation occurred during late November - early December, and was recorded [N.J.S.A. 2A:156A-4c]. Their conversation corroborated Ferrandino accepted the CI's the payment of the portion of the Container Royalty Check and had given it to LaGrasso. Further, the CI and Ferrandino discussed the return to work of an ILA member that had more seniority than the CI and what effect that would have on the CI's hours. Ferrandino advised the CI not to worry about what might happen in the future regarding his hours, prompting the CI to question Ferrandino about turning his/her "thing in . . . Christmas," which was a reference to the yearly payment to LaGrasso. The CI next described to Ferrandino that he/she would have to "triple it this time, if that . . . takes my job you know," meaning the CI believed he/she would have to triple his/her payment to continue his/her work assignment if the ILA member with seniority returned to work - to which Ferrandino advised the CI he/she had nothing to worry
- 7. In December 2009, a recorded consensual conversation between Nunzio LaGrasso and the CI further corroborated LaGrasso's involvement in and control of the collection for the yearly Container Royalty payment. In their conversation, the CI asked LaGrasso about the payment and LaGrasso confirmed that he had received the CI's payment from another individual. The CI confirmed his/her payment this year was made indirectly through another ILA member.
- 8. Shortly after the recorded conversation with LaGrasso described in paragraph 7, the CI engaged in a consensual conversation with the person LaGrasso acknowledged had given him the CI's payment. The person responsible for collecting the CI's monies recalled and corroborated the amount of money [\$700] paid on behalf of the CI and that it was given to LaGrasso as the yearly payment.
- 9. On December 28, 2009, a search warrant was executed upon the persons and vehicles of Nunzio Lagrasso and co-conspirator Rocco Ferrandino. The facts and circumstances supporting those searches are contained in my sworn testimony to this Court and are incorporated herein as if set forth in full. During this search warrant, approximately \$10,000 in United States currency was recovered from the person of Nunzio LaGrasso.
- 10. A subsequent sworn recorded statement provided by a cooperating witness detailed his/her

direct first hand knowledge of and interaction with LaGrasso related to the yearly payment scheme concerning the Container Royalty checks. According to the cooperating witness, in 2009 he/she directly handed monies in excess of \$ 2800 to LaGrasso representing money collections from four [4] ILA members. The cooperating witness also indicated the yearly payment to LaGrasso is initiated when ILA members receive their Container Royalty payment check. The cooperating witness indicated that he/she has been providing this yearly payment to LaGrasso, either directly or indirectly through other ILA members, for at least five years and perceived the payment was necessary for maintaining his/her level of employment at the port, which in part is affected by ILA union officials.

- 11. I believe the foregoing demonstrates the conscious objective by LaGrasso as an official of the ILA to obtain, directly and indirectly through Ferrandino, the property namely monies from ILA members for the taking or withholding of official action related to the union employment of those members contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6. Moreover, I believe the actions demonstrates LaGrasso's direct and indirect through Ferrandino solicitation and acceptance of monies as consideration for knowingly violating or agreeing to violate a duty of fidelity to which LaGrasso was subject to as a union official within the ILA, thereby deriving a benefit in excess of \$1,000, contrary to the provisions of N.J.S.A. 2C:21-10 and N.J.S.A. 2C:2-6.
- In a separate aspect of the investigation, I have probable cause to believe that Nunzio 12. LaGrasso used his relationship with a Newark Police Officer to determine the existence of an ongoing official investigation. Throughout the investigation, physical surveillance was conducted on an almost daily basis at or near the ILA offices of LaGrasso. These surveillance efforts were critical to obtaining evidence of the transactions concerning the offenses charged herein and supported various applications to this Court. On or about August 24, 2009, Nunzio LaGrasso contacted his nephew, Alan Marfia - a Newark Police Officer, for the purposes of determining the nature/identity of vehicles operating in and around LaGrasso's ILA union offices located at 30 Hennessey St. Newark, N.J. On that date, two [2] undercover vehicles were being operated in the area of the ILA offices in Newark by members law enforcement officers assigned to this investigation. At approximately 1:57 p.m., the Newark Police Department data terminals ran the license plates of one of the vehicles; while the license plates of the second vehicle were run at 9:41 and 9:43 p.m. At approximately 1:57 p.m., both surveillance vehicles [including the one that had plates run at that time] were in fact maintaining a position at or near the ILA offices. Those vehicles were no where near the Newark vicinity at 9:40 p.m., when the second surveillance vehicle had plates run twice by Newark Police data terminals.
- 13. A trace of one of the license plate look-ups revealed it was run by a particular Newark Police Officer other than Marfia. That Officer subsequently provided a sworn statement indicating he was contacted by Alan Marfia whom he knew for years having previously been employed as a longshoreman with Marfia in a job obtained through Nunzio LaGrasso. The Officer stated he was contacted by Marfia and asked to run the license plate which he did and

returned the information to Marfia. The Officer added he believed Marfia's request to be odd in that Marfia was in the patrol division and could have run the plate more easily than the Officer who was assigned to a division that did not customarily run license plates. A review of the Officer's wireless telephone records corroborate telephone contact by Marfia's known telephone on August 24, 2009.

- 14. Alan Marfia is employed as a sworn police officer in the Newark, NJ police department assigned to patrol in the 3rd Precinct. I spoke with Alan Marfia about conducting the license plate check on the surveillance vehicles on August 24, 2009. Marfia acknowledged that he did cause other officers to access the Newark Police Department official computers for the purpose of running the license plates.
- 15. Alan Marfia's act of accessing the Newark Police Department data terminals for the purpose of learning the nature/identity of vehicles was an act relating to his office as a sworn law enforcement officer but constituted an unauthorized exercise of his official functions, and Marfia knew said action was committed in an unauthorized manner for the purpose of obtaining a benefit for himself or another, contrary to N.J.S.A. 2C:30-2 a crime of the second degree.

WHEREFORE, it is respectfully requested that the Court authorize the filing of the complaint-warrants accompanying this affidavit.

Det. Brian Bruton, 1737

New Jersey Division of Criminal Justice

Sworn and subscribed to before me this 2/day of April 2010.

Honorade Kevin G. Callahan

Judge-Superior Court of New Jersey



STATE OF NEW JERSEY) SS. COUNTY OF HUDSON)

AFFIDAVIT IN SUPPORT OF ARREST

- I, Brian Bruton, of full age, being duly sworn upon my oath, deposes and says:
- 1. I am a detective employed by the New Jersey Attorney General's Office Division of Criminal Justice, Gangs Organized Crime Unit. As such, I am a law enforcement officer empowered to conduct investigations of and make arrests for all criminal violations of the State of New Jersey.
- 2. Since on or about February 2009, members of this agency, along with law enforcement members of the Waterfront Commission have actively participated in an investigation concerning the criminal activities of an unlawful enterprise operating within and throughout the ports of the New Jersey and New York waterfronts. I am the detective principally responsible for the investigation.
- 3. A component of the investigation consisted of allegations concerning the extension of usurious loans ["loansharking"] by Joseph Queli. The individuals to whom Queli was purportedly extending the usurious loans were principally employed as longshoreman at the ports of New York and New Jersey and members of the International Longshoreman's Association [ILA].
- 4. In furtherance of the investigation, during the month of February 2009, a confidential informant [CI] who has given reliable information subject to independent corroboration, provided information regarding his/her direct interaction with Joseph Queli concerning a usurious loan he/she was indebted to Queli for. During the course of this investigation, the CI has consensually recorded [N.J.S.A. 2A:156A-4c] conversations with Joseph Queli while engaged in making regular weekly payments of United States Currency to him. These payments included the usurious interest being charged by Queli. Additionally, the CI has recorded in excess of twenty [20] payments made directly to Joseph Queli. According to the CI, Joseph Queli requires the weekly payment of "two points" interest for the loan; a rate equivalent to 104% per year. In addition to the CI, the investigation has been able to obtain the sworn statement of three [3] other individuals - two of whom are members of the ILA who detail their own usurious loan obligations to Queli with interest rates between 1 1/2 and 3 points per week [78% to 156% per year] and their direct payment of United States currency to Queli in furtherance thereof. I also have an additional statement from an individual who is an ILA member who advised he/she had a usurious loan with Queli within the last 18 months that was at 2 points per week [104% per year] and that he/she made direct payments

of interest in United States currency to Queli in furtherance thereof. The monies paid directly to Queli in the aggregate as described by the individuals in this paragraph were in the approximate amount of \$20,000.

- 5. Moreover, on several occasions, the CI discussed in paragraph 4 was instructed by Joseph Queli to make his/her regular usurious loan payment to Nicholas Bergamotto who in turn would forward those monies to Joseph Queli. According to the CI, Bergamotto was aware of the CI's outstanding usurious 'loan with Queli and the monies being collected would be turned over to Queli for that purpose. At one point during this investigation in October 2009, the targets of the investigation suggested they became aware of the presence of surveillance vehicles in and around the "Down Neck" section of Newark, NJ. It was thereafter that Queli enlisted Bergamotto to start meeting the CI to collect the monies due on the usurious loan an effort I believe designed to insulate himself and avoid detection by law enforcement.
- 6. Between October and December 2009, the CI consensually recorded three [3] conversations with Bergamotto providing him [Bergamotto] United States currency in satisfaction of the outstanding usurious loan with Queli. These conversations included an acknowledgment of the amount of monies owed to Queli and when Bergamotto intended on meeting Queli to turn over the usurious loan payments. Members of surveillance observed Bergamotto on several occasions meeting with Queli after the CI gave Bergamotto United States currency The monies paid to Queli through Bergamotto on these three [3] occasions were in the approximate amount of \$750.
- 7. Joseph M. Queli's criminal history consists of a 1998 arrest by the Federal Bureau of Investigation for Racketeering, Illegal Gambling, and Unlawful Extension of Credit, which resulted in his incarceration for 30 months. Bergamotto has no known criminal history.
- 8. The foregoing activity constituting acts by Joseph Queli and Nicholas Bergamotto of the extension of loans at a rate exceeding the maximum rate permitted by law and the collection of monies as interest on said loans, contrary to the provisions of N.J.S.A. 2C:21-19/N.J.S.A. 2C:2-6, a crime of the second degree. Additionally, the aggregate collection of monies in furtherance of said unlawful usurious loan activity constitute possession of monies known to be derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25/N.J.S.A. 2C:2-6, a crime of the third degree.

WHEREFORE, it is respectfully requested the Court authorize the filing of the

complaint -warrants accompanying this affidavit.

Detective Brian Bruton

New Jersey Division of Criminal Justice

Sworn and subscribed to before me this 2 day of April 2010.

norable Kevin G. Callahan

Judge - Superior Court of New Jersey