

FILED

APR 27 2016

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ683-16-1

Superior Court

Docket Number 16-04-00066-S

STATE OF NEW JERSEY)

v.)

CHARLES TUZZO)

VITO ALBERTI)

DOMENICK PUCILLO)

ROBERT SPAGNOLA)

MANUEL RODRIGUEZ)

VINCENT COPPOLA)

INDICTMENT

JOHN TRAINOR)

ABEL J. RODRIGUES)

JERRY ALBANESE)

FLOR MIRANDA)

MIGUEL JOSE VARELA LOPEZ)

SUZANNE SCATTURO)

DEBRA SPAGNOLA)

and)

LISA TRAINOR)

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

COUNT ONE

(Racketeering - First Degree)

CHARLES TUZZO

VITO ALBERTI

DOMENICK PUCILLO

ROBERT SPAGNOLA

MANUEL RODRIGUEZ

VINCENT COPPOLA

JOHN TRAINOR

ABEL J. RODRIGUES

JERRY ALBANESE

and

FLOR MIRANDA

who are named as the defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members or associates of the criminal enterprise but not named as defendants herein, at the times and places herein specified, did commit the crime of racketeering, that is, the defendants and other persons employed by or associated with an enterprise engaged in or the activities of which affected trade or commerce, purposely or knowingly did conduct or participate directly or indirectly, or did conspire

in the conduct of the enterprise's affairs through a pattern of racketeering activity, in violation of N.J.S.A. 2C:41-2c and N.J.S.A. 2C:41-2d, all as hereinafter described.

THE RELEVANT TIMES

The predicate criminal activity occurred between in or about October 2007, and in or about April 2016.

THE RELEVANT PLACES

The predicate criminal activity took place at the Township of Irvington, at the City of Newark, and at the Township of Millburn, all in the County of Essex, at the City of Hoboken, in the County of Hudson, in the Township of Marlboro, in the County of Monmouth, at the Borough of Chatham, at the Township of Morris, and at the Borough of Florham Park, all in the County of Morris, at the Township of Brick, in the County of Ocean, at the Township of Bridgewater, in the County of Somerset, at the City of Elizabeth, at the Borough of New Providence, and at the Township of Union, all in the County of Union, in the State of Florida, in the State of New York, elsewhere, and within the jurisdiction of this Court.

THE ENTERPRISE

CHARLES TUZZO, VITO ALBERTI, DOMENICK PUCILLO, ROBERT SPAGNOLA, MANUEL RODRIGUEZ, VINCENT COPPOLA, JOHN TRAINOR, ABEL J. RODRIGUES, JERRY ALBANESE, and FLOR MIRANDA, all of whom are co-conspirators, and Jennifer Mann, who is a co-conspirator

and member or associate of the enterprise, but not charged in this indictment, and other persons whose identities are both known and unknown to the State Grand Jurors, would constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a union or group of individuals associated in fact, or associates thereof, which, among other names, members or associates thereof are known as the "Genovese" organized crime family, for the purposes set forth below.

THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise would include the maintenance of its strength and the assurance of its perpetuation through specific rules and protocols applicable to its members and associates, including: discussing matters pertaining to the operation, conduct and control of the enterprise with no one other than members or highly trusted associates of the enterprise; resolving disputes or seeking direction from superiors within the enterprise through a specific chain of command; enforcing the protocols of the enterprise through any means necessary, including threats or use of violence; keeping a member's immediate supervisor within the enterprise informed of illegal activities and law enforcement activities targeting the enterprise; collectively generating income on behalf of and for the benefit of the enterprise through various illicit schemes; and dividing proceeds from

enterprise members' criminal activities in accordance with enterprise protocol. A further purpose of the enterprise would be to shield its operation from detection by law enforcement authorities by, among other means: using code names when communicating; resorting to in-person meetings; using wireless telephones in fictitious or nominee names; prohibiting membership or association in the enterprise to those who may have law enforcement familial relationships or familial relationships with those who may have cooperated with law enforcement.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, engaged in by members of the enterprise, did consist of at least two incidents of racketeering conduct during the relevant time period stated above, including but not limited to: criminal usury in violation of N.J.S.A. 2C:21-19, gambling offenses in violation of N.J.S.A. 2C:37-1 et seq., forgery and fraudulent practices in violation of N.J.S.A. 2C:21-1 et seq., failure to file tax returns or reports in violation of N.J.S.A. 54:52-8, filing a fraudulent tax return in violation of N.J.S.A. 54:52-10, failure to pay gross income taxes in violation of N.J.S.A. 54:52-9, operating an unlicensed money transmitting business in violation of 18 U.S.C. 1961(1)(B) and 18 U.S.C. 1960, money laundering in violation of N.J.S.A. 2C:21-25,

involving property valued in excess of \$500,000, and conspiracy to commit the foregoing crimes in violation of N.J.S.A. 2C:5-2, primarily in the following ways:

CHARLES TUZZO

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of criminal usury, promoting gambling, operating an unlicensed check cashing facility and money laundering, all of which is the subject of Counts 2, 3, 4, 6, 9, 10, 11, 13.

VITO ALBERTI

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of criminal usury, filing a fraudulent return, failure to pay gross income tax, promoting gambling, operating an unlicensed check cashing facility and money laundering, all of which is the subject of Counts 2, 3, 4, 6, 9, 10, 11, 13, 24, and 25 of this Indictment.

DOMENICK PUCILLO

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of criminal usury, possession of usurious loan records, filing a fraudulent tax return, failure to pay gross income tax, operating an unlicensed check cashing facility and money laundering, all of which is the subject of Counts 2, 3, 4, 5, 6, 9, 10, 15, and 16 of this Indictment.

ROBERT SPAGNOLA

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of criminal usury, filing a fraudulent tax return, failure to file tax return, failure to pay gross income tax, and money laundering, all of which is the subject of Counts 2, 3, 4, 6, 26, 27, 28, and 29 of this Indictment.

MANUEL RODRIGUEZ

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of filing a fraudulent return, failure to file tax returns, failure to pay gross income tax, operating an unlicensed check cashing facility and money laundering, all of which is the subject of Counts 2, 9, 10, 19, 20, and 21 of this Indictment.

VINCENT COPPOLA

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of promoting gambling, possession of gambling records, failure to file tax returns, failure to pay gross income tax, and money laundering, all of which is the subject of Counts 2, 11, 12, 13, 22, and 23 of this Indictment.

JOHN TRAINOR

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of promoting gambling,

possession of gambling records, failure to file tax returns, failure to pay gross income tax, forgery, and money laundering, all of which is the subject of Counts 2, 11, 12, 13, 14, 30, and 31 of this Indictment.

ABEL J. RODRIGUES

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of filing a fraudulent tax return, failure to pay gross income tax, operating an unlicensed check cashing facility and money laundering, all of which is the subject of Counts 2, 9, 10, 17, 18 of this Indictment.

JERRY ALBANESE

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of promoting gambling, possession of gambling records, and money laundering, all of which is the subject of Counts 2, 11, 12, and 13 of this Indictment.

FLOR MIRANDA

did commit the racketeering conduct by engaging in and or conspiring to commit repeated acts of criminal usury, possession of usurious loan records, operating an unlicensed check cashing facility and money laundering, all of which is the subject of Counts 2, 3, 4, 5, 6, 9, and 10 of this Indictment.

All in violation of N.J.S.A. 2C:41-2c, N.J.S.A. 2C:41-2d,
and against the peace of this State, the government and dignity
of the same.

FORFEITURES

1. All allegations heretofore set forth are hereby incorporated by reference and re-alleged as if fully set forth herein, for the purpose of alleging forfeitures pursuant to N.J.S.A. 2C:41-3b.

2. The defendants have property constituting:

A. Interests, including money and other things of value, established, acquired, maintained, operated, controlled, conducted, or participated in, in violation of N.J.S.A. 2C:41-2c, and N.J.S.A. 2C:41-2d.

3. The said interests, all subject to forfeiture to the State of New Jersey, expressly includes all items of real and personal property detailed within the attached "Appendix A" to this indictment which is incorporated herein as if set forth in full.

COUNT TWO

(Conspiracy - First Degree)

CHARLES TUZZO

VITO ALBERTI

DOMENICK PUCILLO

ROBERT SPAGNOLA

MANUEL RODRIGUEZ

VINCENT COPPOLA

JOHN TRAINOR

ABEL J. RODRIGUES

JERRY ALBANESE

AND

FLOR MIRANDA

who are named as the defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members or associates of the criminal enterprise but not named as defendants herein, between in or about October 2007, and in or about April 2016, at the Township of Irvington, at the City of Newark, and at the Township of Millburn, all in the County of Essex, at the City of Hoboken, in the County of Hudson, in the Township of Marlboro, in the County of Monmouth, at the Borough of Chatham, Township of Morris, and at the Borough of Florham Park, all in the County of Morris, at the Township of Brick, in the County of Ocean, at the Township

of Bridgewater, in the County of Somerset, at the City of Elizabeth, at the Borough of New Providence, and at the Township of Union, all in the County of Union, in the State of Florida, in the State of New York, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of criminal usury, business of criminal usury, possession of usurious loan records, money laundering, operating an unlicensed check cashing facility, promoting gambling, possession of gambling records, failure to file tax returns, filing a fraudulent tax returns, and failure to pay gross income tax, did agree that:

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

B. One or more of them knowingly would aid in the planning, solicitation, or commission of the said crimes, that is:

1. Without being authorized or permitted by law to do so, knowingly did take, loan or agree to loan, directly or indirectly, any money or other property, or agree to take or receive money as interest on a loan or forbearance of any money or other interest on a loan, at a rate of interest in excess of 50% per annum or the equivalent rate for a longer or shorter period, contrary to the provisions of N.J.S.A. 2C:21-19a.

2. Not being authorized or permitted by law to do so, knowingly did engage in the business of making loans or

forbearances at a rate in excess of 50% per annum, which rate did exceed the maximum rate permitted by law and in violation of N.J.S.A. 2C:21-19a, contrary to the provisions of N.J.S.A. 2C:21-19b.

3. With knowledge of the contents thereof, did possess a writing, paper instrument or article used to record a loan or forbearance or to record criminally usurious loan transactions in violation of N.J.S.A. 2C:21-19a, contrary to the provisions of N.J.S.A. 2C:21-19c.

4. Transport or possess property known or which a reasonable person would believe to be derived from criminal activity, or engage in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity with the intent to facilitate or promote the criminal activity or knowing the transaction is designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity or to avoid a transaction reporting requirement under the laws of this State or any other state or of the United States, or direct, organize, finance, plan, manage, supervise, or control the transportation of or the transactions in property known or which a reasonable person would believe to be derived from criminal activity, said

property having a value of \$500,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25(a), (b), (c).

5. Knowingly cash a check for consideration that would be required to be reported pursuant to the laws or regulations of this State had the actor obtained the license required by N.J.S.A. 17:15A-32, without having first obtained a license as required by N.J.S.A. 17:15A-32, contrary to the provisions of N.J.S.A. 17:15A-49.

6. Knowingly accept or receive money or other property, pursuant to an agreement or understanding with any person, whereby one or more of them would participate in the proceeds of gambling activity or engage in conduct which would materially aid gambling activity, by engaging in or materially aiding bookmaking to the extent that one or more of them received or accepted in any one day more than five bets totaling more than \$1,000, contrary to the provisions of N.J.S.A. 2C:37-2a(1), N.J.S.A. 2C:37-2a(2), and N.J.S.A. 2C:37-2b(1).

7. With knowledge of the contents thereof, possess a 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:37-3a(1).

8. Knowingly, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], to fail to file a tax return as required to be filed pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-8.

9. Knowingly, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], files, prepares, causes to be filed or assists in the preparation or filing of a false or fraudulent return, report, statement, or application required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-10.

10. Knowingly, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., to fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9.

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 THREE

(Criminal Usury - Second Degree)

DOMENICK PUCILLO

FLOR MIRANDA

ROBERT SPAGNOLA

VITO ALBERTI

AND

CHARLES TUZZO

between in or about October 2007, and in or about October 2013, at the Township of Irvington, at the City of Newark, and at the Township of Millburn, all in the County of Essex, at the City of Hoboken, in the County of Hudson, in the Township of Marlboro, in the County of Monmouth, at the Borough of Chatham, at the Township of Morris, and at the Borough of Florham Park, all in the County of Morris, at the Township of Bridgewater, in the County of Somerset, at the City of Elizabeth, at the Borough of New Providence, and at the Township of Union, all in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, without being authorized or permitted to do so, knowingly did loan or agree to loan, directly or indirectly, money or other property, or did take, agree to take, or receive money or other property as interest on a loan or on the forbearance of any money or

other interest, at a rate of interest in excess of 50% per annum or the equivalent rate for a longer or shorter period, contrary to the provisions of N.J.S.A. 2C:21-19a(1), N.J.S.A. 2C:21-19a(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Business of Criminal Usury - Second Degree)

DOMENICK PUCILLO

FLOR MIRANDA

ROBERT SPAGNOLA

VITO ALBERTI

AND

CHARLES TUZZO

between in or about October 2007, and in or about October 2013, at the Township of Irvington, at the City of Newark, and at the Township of Millburn, all in the County of Essex, at the City of Hoboken, in the County of Hudson, in the Township of Marlboro, in the County of Monmouth, at the Borough of Chatham, at the Township of Morris, and at the Borough of Florham Park, all in the County of Morris, at the Township of Bridgewater, in the County of Somerset; at the City of Elizabeth, at the Borough of New Providence, and at the Township of Union, all in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, not being authorized or permitted to do so, knowingly did engage in the business of making loans or forbearances at a rate in excess of 50% per annum, which rate did exceed the maximum rate permitted by law and in violation of N.J.S.A. 2C:21-19a, contrary to the provisions of N.J.S.A.

2C:21-19b, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Possession of Usurious Loan Records - Third Degree)

DOMENICK PUCILLO

AND

FLOR MIRANDA

between in or about October 2007, and in or about October 2013, at the City of Newark, in the County of Essex, at the Borough of Florham Park, in the County of Morris, elsewhere, and within the jurisdiction of this Court, with knowledge of the contents thereof, did possess a writing, paper instrument or article used to record a loan or forbearance or to record criminally usurious loan transactions in violation of N.J.S.A. 2C:21-19(a), contrary to the provisions of N.J.S.A. 2C:21-19c, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Money Laundering - First Degree)

DOMENICK PUCILLO

FLOR MIRANDA

ROBERT SPAGNOLA

VITO ALBERTI

AND

CHARLES TUZZO

between in or about October 2007, and in or about October 2013, at the Township of Irvington, at the City of Newark, and at the Township of Millburn, all in the County of Essex, at the City of Hoboken, in the County of Hudson, in the Township of Marlboro, in the County of Monmouth, at the Borough of Chatham, Township of Morris, and at the Borough of Florham Park, all in the County of Morris, at the Township of Bridgewater, in the County of Somerset, at the City of Elizabeth, at the Borough of New Providence, and at the Township of Union, all in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known or which a reasonable person would believe to be derived from criminal activity, or engage in transactions involving property known or which a reasonable person would believe to be derived from criminal activity with the intent to facilitate or promote the criminal activity or knowing the

transaction is designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity or to avoid a transaction reporting requirement under the laws of this State or any other state or of the United States, or did direct, organize, finance, plan, manage, supervise, or control the transportation of or the transactions in property known or which a reasonable person would believe to be derived from criminal activity, said property having a value of \$500,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2) (a) (b), N.J.S.A. 2C:21-25c, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Conspiracy - First Degree)

DOMENICK PUCILLO

FLOR MIRANDA

AND

MIGUEL JOSE VARELA LOPEZ

who are named as defendants herein, and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between in or about January 2012, and in or about June 2012, at the City of Newark, in the County of Essex, in the State of Florida, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crime of money laundering, did agree together that:

A. One or more of them knowingly would engage in conduct which would constitute the aforementioned crime, or

B. One or more of them knowingly would aid in the planning, solicitation, or commission of said crime, that is:

1. Knowingly transport or possess property known or which a reasonable person would believe to be derived from criminal activity, or engage in transactions involving property known or which a reasonable person would believe to be derived from criminal activity with the intent to facilitate or promote the criminal activity or knowing the transactions were designed

in whole or in part to disguise the nature, location, source, ownership or control of said property, said property having a value of \$500,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25(a) and (b).

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 EIGHT

(Money Laundering - First Degree)

DOMENICK PUCILLO

FLOR MIRANDA

AND

MIGUEL JOSE VARELA LOPEZ

between in or about January 2012, and in or about June 2012, at the City of Newark, in the County of Essex, in the State of Florida, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known, or which a reasonable person would believe to be derived from criminal activity, or engage in transactions involving property known or which a reasonable person would believe to be derived from criminal activity with the intent to facilitate or promote the criminal activity or knowing the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of said property, said property having value of \$500,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Operating an Unlicensed Check Cashing Facility - Third Degree)

DOMENICK PUCILLO

FLOR MIRANDA

ABEL RODRIGUES

MANUEL RODRIGUEZ

VITO ALBERTI

AND

CHARLES TUZZO

between in or about June 2008 and in or about December 2012, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly cash a check for consideration that would be required to be reported pursuant to the laws or regulations of this State had the actor obtained the license required by N.J.S.A. 17:15A-32, without having first obtained a license as required by N.J.S.A. 17:15A-32, contrary to the provisions of N.J.S.A. 17:15A-49 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Money Laundering - First Degree)

DOMENICK PUCILLO

FLOR MIRANDA

ABEL RODRIGUES

MANUEL RODRIGUEZ

VITO ALBERTI

AND

CHARLES TUZZO

between in or about June 2008 and in or about December 2012, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, knowingly did transport or possess property known or which a reasonable person would believe to be derived from criminal activity, or engage in transactions involving property known or which a reasonable person would believe to be derived from criminal activity with the intent to facilitate or promote the criminal activity or knowing the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of said property, or to avoid a transaction reporting requirement under the laws of this State or any other state or of the United States, or did direct, organize, finance, plan, manage, supervise, or control the transportation of or the transactions in property known or which a reasonable person

would believe to be derived from criminal activity, said property having a value of \$500,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b(1)(2), N.J.S.A. 2C:21-25c, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Promoting Gambling - Third Degree)

VINCENT COPPOLA

JOHN TRAINOR

JERRY ALBANESE

CHARLES TUZZO

AND

VITO ALBERTI

between in or about January 2011, and in or about January 2012, at the Township of Irvington, at the City of Newark, and at the Township of Millburn, all in the County of Essex, at the City of Hoboken, in the County of Hudson, in the Township of Marlboro, in the County of Monmouth, at the Borough of Chatham, and at the Borough of Florham Park, both in the County of Morris, at the Township of Brick, in the County of Ocean, at the Township of Bridgewater, in the County of Somerset, at the City of Elizabeth, at the Borough of New Providence, and at the Township of Union, all in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, did promote gambling by knowingly accepting or receiving money or other property, pursuant to an agreement or understanding with any person whereby the said defendants did or would participate in the proceeds of gambling activity or did knowingly engage in conduct which materially aided any form of gambling activity

including but not limited to conduct directed toward the creation or establishment of a particular game, contest, scheme, device or activity involved, towards the solicitation or inducement of persons to participate therein, toward the arrangement of any of its financial or recording phases, or toward any other phase of its operation, by engaging in bookmaking and receiving or accepting in any one day more than five bets totaling more than \$1000, contrary to the provisions of N.J.S.A. 2C:37-2a(1), N.J.S.A. 2C:37-2a(2), N.J.S.A. 2C:37-2b(1), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Possession of Gambling Records - Third Degree)

VINCENT COPPOLA

JOHN TRAINOR

AND

JERRY ALBANESE

between in or about January 2011, and in or about January 2012, at the Township of Irvington, at the City of Newark, and at the Township of Millburn, all in the County of Essex, at the City of Hoboken, in the County of Hudson, in the Township of Marlboro, in the County of Monmouth, at the Borough of Chatham, and at the Borough of Florham Park, both in the County of Morris, at the Township of Brick, in the County of Ocean, at the Township of Bridgewater, in the County of Somerset, at the City of Elizabeth, at the Borough of New Providence, and at the Township of Union, all in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, with knowledge of the contents thereof, did possess a 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 \$1000, contrary to the provisions of N.J.S.A. 2C:37-3a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

(Money Laundering - First Degree)

VINCENT COPPOLA

JOHN TRAINOR

JERRY ALBANESE

CHARLES TUZZO

AND

VITO ALBERTI

between in or about January 2011, and in or about December 2012, at the Township of Irvington, at the City of Newark, and at the Township of Millburn, all in the Count of Essex, at the City of Hoboken, in the County of Hudson, in the Township of Marlboro, in the County of Monmouth, at the Borough of Chatham, and at the Borough of Florham Park, both in the County of Morris, at the Township of Brick, in the County of Ocean, at the Township of Bridgewater, in the County of Somerset, at the City of Elizabeth, at the Borough of New Providence, and at the Township of Union, all in the County of Union, in the State of New York, elsewhere, and within the jurisdiction of this Court, knowingly engaged in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity with the intent to facilitate or promote the criminal activity or knowing the transaction is designed in whole or in part to conceal or disguise the nature, location, source,

ownership or control of the property derived from criminal activity or did direct, organize, finance, plan, manage, supervise, or control the transportation of or the transactions in property known or which a reasonable person would believe to be derived from criminal activity, said property having a value of \$500,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2), N.J.S.A. 2C:21-25c, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOURTEEN

(Forgery - Third degree)

JOHN TRAINOR

in or about April 2012, at the City of Newark, and at the Township of Millburn, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, with purpose to defraud or injure another, knowingly did execute writings, namely checks payable to JOHN TRAINOR so that it purported to be the act of Joann Parr, who did not authorize said act, contrary to the provisions of N.J.S.A. 2C:21-1a(2), and against the peace of this State, the government and dignity of the same.

COUNT FIFTEEN

(Filing Fraudulent Tax Return - Third Degree)

DOMENICK PUCILLO

between in or about April 2009, and in or about April 2013, at the Borough of Florham Park, in the County of Morris, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did file, prepare, cause to be filed or assist in the preparation or filing of a false or fraudulent return, report, statement, or application for the calendar years ending in 2008, 2009, 2010, 2011, and 2012, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT SIXTEEN

(Failure to Pay Gross Income Tax - Third Degree)

DOMENICK PUCILLO

between in or about January 2008, and in or about April 2016, at the Borough of Florham Park, in the County of Morris, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar years ending in 2008, 2009, 2010, 2011, and 2012, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT SEVENTEEN

(Filing Fraudulent Tax Return - Third Degree)

ABEL RODRIGUES

between in or about April 2009, and in or about April 2013, at the Township of Bridgewater, in the County of Somerset, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did file, prepare, cause to be filed or assist in the preparation or filing of a false or fraudulent return, report, statement, or application for the calendar years ending in 2008, 2009, 2010, 2011, and 2012, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT EIGHTEEN

(Failure to Pay Gross Income Tax - Third Degree)

ABEL RODRIGUES

between in or about January 2008, and in or about April 2016, at the Township of Bridgewater, in the County of Somerset, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar years ending in 2008, 2009, 2010, 2011 and 2012, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT NINETEEN

(Filing Fraudulent Tax Return - Third Degree)

MANUEL RODRIGUEZ

between in or about April 2009, and in or about April 2012, at the Borough of Chatham, in the County of Morris, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did file, prepare, cause to be filed or assist in the preparation or filing of a false or fraudulent return, report, statement, or application for the calendar years ending in 2008, 2009, 2010, and 2011, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY

(Failure to File Tax Return - Third Degree)

MANUEL RODRIGUEZ

between in or about January 2012, and in or about April 2016, at the Borough of Chatham, in the County of Morris, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did fail to file a tax return for the calendar year ending in 2012, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-8.

COUNT TWENTY-ONE

(Failure to Pay Gross Income Tax - Third Degree)

MANUEL RODRIGUEZ

between in or about January 2008, and in or about April 2016, at the Borough of Chatham, in the County of Morris, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar years ending in 2008, 2009, 2010, 2011 and 2012, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-TWO

(Failure to File Tax Return - Third Degree)

VINCENT COPPOLA

between in or about January 2011, and in or about April 2016, at the Township of Union, in the County of Union, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did fail to file a tax return for the calendar year ending in 2011, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-8.

COUNT TWENTY-THREE

(Failure to Pay Gross Income Tax - Third Degree)

VINCENT COPPOLA

between in or about January 2011, and in or about April 2016, at the Township of Union, in the County of Union, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar year ending in 2011, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FOUR

(Filing Fraudulent Tax Return - Third Degree)

VITO ALBERTI

and

SUZANNE SCATURRO

between in or about April 2009, and in or about April 2013, at the Township of Morris, in the County of Morris, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did file, prepare, cause to be filed or assist in the preparation or filing of a false or fraudulent return, report, statement, or application for the calendar years ending in 2008, 2009, 2010, 2011, and 2012, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-10 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-FIVE

(Failure to Pay Gross Income Tax - Third Degree)

VITO ALBERTI

and

SUZANNE SCATURRO

between in or about January 2008, and in or about April 2016, at the Township of Morris, in the County of Somerset, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar years ending in 2008, 2009, 2010, 2011 and 2012, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNTY TWENTY-SIX

(Filing Fraudulent Tax Return - Third Degree)

ROBERT SPAGNOLA

and

DEBRA SPAGNOLA

on or about April 15, 2012, at Township of Marlboro, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did file, prepare, cause to be filed or assist in the preparation or filing of a false or fraudulent return, report, statement, or application for the calendar year ending in 2011, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-10 and N.J.S.A.2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-SEVEN

(Failure to Pay Gross Income Tax - Third Degree)

ROBERT SPAGNOLA

and

DEBRA SPAGNOLA

between in or about January 2011, and in or about April 2016, at the Township of Marlboro, in the County of Monmouth, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar year ending in 2011, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWENTY-EIGHT

(Failure to File Tax Return - Third Degree)

ROBERT SPAGNOLA

between in or about January 2012, and in or about April 2016, at the Township of Marlboro, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did fail to file a tax return for the calendar year ending in 2012, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-8.

COUNT TWENTY-NINE

(Failure to Pay Gross Income Tax - Third Degree)

ROBERT SPAGNOLA

between in or about January 2012, and in or about April 2016, at the Township of Marlboro, and within the jurisdiction of this Court, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar year ending in 2012, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY

(Filing Fraudulent Tax Return - Third Degree)

JOHN TRAINOR

between in or about April 2011, and in or about April 2013, at the Township of Brick, in the County of Ocean, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did file, prepare, cause to be filed or assist in the preparation or filing of a false or fraudulent return, report, statement, or application for the calendar years ending in 2010, 2011, and 2012, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-ONE

(Failure to Pay Gross Income Tax - Third Degree)

JOHN TRAINOR

between in or about January 2010, and in or about April 2016, at the Township of Brick, in the County of Ocean, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar years ending in 2010, 2011, and 2012, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-TWO

(Filing Fraudulent Tax Return - Third Degree)

LISA TRAINOR

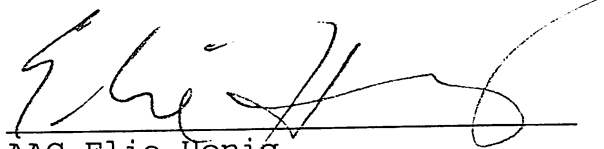
between in or about April 2010, and in or about April 2013, at the Township of Brick, in the County of Ocean, elsewhere, and within the jurisdiction of this Court, with intent to defraud the State or to evade, avoid, or otherwise not make timely payment of any tax, fee, penalty, interest, or any part thereof which shall be due pursuant to the provisions of the State Tax Uniform Procedure law [R.S. 54:48-1 et seq.], did file, prepare, cause to be filed or assist in the preparation or filing of a false or fraudulent return, report, statement, or application for the calendar years ending in 2009, 2010, 2011, and 2012, as required to be filed pursuant to the provisions of the State Tax Uniform Procedure Law, [R.S. 54:48-1 et seq.], contrary to the provisions of N.J.S.A. 54:52-10, and against the peace of this State, the government and dignity of the same.

COUNT THIRTY-THREE

(Failure to Pay Gross Income Tax - Third Degree)

LISA TRAINOR

between in or about January 2009, and in or about April 2016, at the Township of Brick, in the County of Ocean, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with intent to evade, avoid, or otherwise not make timely payment of the tax required to be paid pursuant to N.J.S.A. 54:48-1 et seq., for the calendar years ending in 2009, 2010, 2011, and 2012, did fail to pay and turn over the gross income taxes due, contrary to the provisions of N.J.S.A. 54:52-9, and against the peace of this State, the government and dignity of the same.



AAG Elie Honig
Director
Division of Criminal Justice

A True Bill:

Amy Sonntag
Foreperson

Date: 4/27/16

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ683-16-1
Superior Court
Docket Number _____

STATE OF NEW JERSEY)

v.)

CHARLES TUZZO)

VITO ALBERTI)

DOMENICK PUCILLO)

ROBERT SPAGNOLA)

MANUEL RODRIGUEZ)

VINCENT COPPOLA)

JOHN TRAINOR)

ABEL J. RODRIGUES)

JERRY ALBANESE)

FLOR MIRANDA)

MIGUEL JOSE VARELA LOPEZ)

SUZANNE SCATTURO)

DEBRA SPAGNOLA)

and)

LISA TRAINOR)

APPENDIX A

1. All allegations set forth within Count One of the captioned Indictment are hereby incorporated by reference and re-alleged as if fully set forth herein, for the purpose of alleging forfeitures pursuant to N.J.S.A. 2C:41-3b.

2. The defendants have property constituting:

A. Interests, including money and other things of value, established, acquired, maintained, operated, controlled, conducted, or participated in, in violation of N.J.S.A. 2C:41-2c, and N.J.S.A. 2C:41-2d.

3. The said interests, all subject to forfeiture to the State of New Jersey, expressly include all items of real and personal property:

I) REAL PROPERTY

<u>Property Address</u>	<u>Property Owner</u>
1) 4 Nottingham Way Florham Park, NJ 07932 Block: 2101 Lot:37	Domenick & Jodi Pucillo
2) 630-632 North Wood Avenue Linden, NJ 07036 Block: 209 Lot: 26	Domenick Pucillo & Linden Properties Elizabeth, LLC
3) 640-650 North Wood Avenue Linden, NJ 07036 Block: 209 Lot: 27	Domenick Pucillo & Linden Properties Elizabeth, LLC
4) 129 Elm Street Newark, NJ 07105 Block: 192 Lot: 34	Abel Rodrigues

- | | |
|---|---|
| <p>5) 466 Mahnken Drive
 Bridgewater, NJ 08807
 Block: 417
 Lot: 7</p> | <p>Abel Rodrigues</p> |
| <p>6) 414 Chestnut Street
 Newark, NJ 07105
 Block: 992
 Lot: 28</p> | <p>Abel Rodrigues</p> |
| <p>7) 132 Union Street
 Newark, NJ
 Block: 192
 Lot: 48</p> | <p>Abel Rodrigues</p> |
| <p>8) 15 Beth Lane
 Morganville, Marlboro Twp, NJ 07751
 Block: 152
 Lot: 1</p> | <p>Robert & Debra
 Spagnola</p> |
| <p>9) 5 Robin Court
 Morris Township, NJ
 Block: 7602
 Lot:7</p> | <p>Vito Alberto &
 Suzanne Scaturro</p> |

II) PERSONAL PROPERTY

A - Bank Accounts:

<u>Account Name</u>	<u>Account Number</u>
<u>Wells Fargo accounts:</u>	
1) Rapid Check Cashing Domenick Pucillo	7433944829
2) Metropolitan Architecture Domenick Pucillo	8506882755
3) Linden Properties Domenick Pucillo	7433944811
4) Real Estate Ventures Domenick Pucillo	7433908840

5) Titan Millwright Services, LLC Domenick Pucillo	7433944803
6) 357 Wilson Avenue, LLC Domenick Pucillo	8506882748
7) 1095 Clinton Avenue Associates, LLC Domenick Pucillo	8506882797
8) Dante Properties, LLC Domenick Pucillo	7433944837
9) Tri State Check Cashing Domenick Pucillo	7433944795
10) Domenick and Dante Pucillo	9337851050
11) Domenick and Jodi Pucillo Prime Equity Line	681 6827462 1998
12) Domenick Pucillo Consumer Account	2802128161
13) Domenick Pucillo Consumer Account	9337671490
14) Domenick and Dante Pucillo Opportunity Checking	1286003007
15) Annmarie Delorenza Domenick Pucillo Way 2 Save Savings	2802164000
16) Dante John Pucillo Revocable Trust Domenick Pucillo	5802134535
17) Money Market Savings Domenick and Dante Pucillo	7802305933
18) Annmarie Delorenza	7802126388
<u>Brunswick Bank & Trust Company accounts:</u>	
19) JJJ&P Industries Inc. 805 Roosevelt Ave. Carteret, NJ 07008	770023240 770023259 770023267 770023283

770023305
770023313
770023321
770023330
770023348
770023356
700101025

20) Titan Millwright Services, LLC 440764265
21) MAC, LLC 440764257
22) Real Estate Ventures Capital Group, LLC 440764249
23) Dante Properties, LLC 440764230
24) 1095 Clinton Ave. Associates, LLC 440764222

New York Community Bank, N.A. accounts:

25) Abel J. Rodrigues 41700005899
26) Abel J. Rodrigues 00101009696
27) Abel J. Rodrigues Safe Deposit Box 303

Garden State Community Bank accounts:

28) Abel J. Rodrigues 00101009696

Lusitania Savings Bank accounts:

29) Abel J. Rodrigues 0014004171
30) Abel J. Rodrigues 0010004171

Guardian Life Insurance Policies

31) Domenick Pucillo 5433189
Tri-State Check Cashing LLC
Retirement Plan
4 Nottingham Drive
Florham Park, NJ 07932
Policy Date: 9-1-2010
2014 Cash Value \$71,278.57

32) Domenick Pucillo
Tri-State Check Cashing LLC
Cash Balance Pension Plan
4 Nottingham Drive
Florham Park, NJ 07932
Policy Date: 9-1-2010
2014 Cash Value \$328,373.42

5433193

FILED

APR 27 2016

State Grand Jury Judge

State Grand Jury

Number SGJ683-16-1

Superior Court

Docket Number 16-04-00066-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

CHARLES TUZZO)

VITO ALBERTI)

DOMENICK PUCILLO)

ROBERT SPAGNOLA)

MANUEL RODRIGUEZ)

VINCENT COPPOLA)

JOHN TRAINOR)

ABEL J. RODRIGUES)

JERRY ALBANESE)

FLOR MIRANDA)

MIGUEL JOSE VARELA LOPEZ)

SUZANNE SCATTURO)

DEBRA SPAGNOLA)

and)

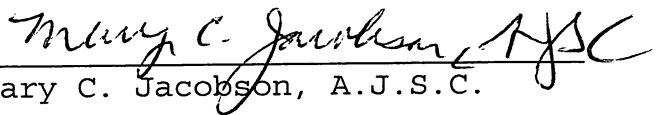
LISA TRAINOR)

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

IT IS ORDERED on this *27th* day of *April*, 2016, pursuant to paragraph 8 of the State Grand Jury Act, that the

County of Morris 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 Morris for filing.


Mary C. Jacobson, A.J.S.C.