

SUPREME COURT OF THE STATE OF NEW YORK  
CRIMINAL TERM : COUNTY OF QUEENS

-----X  
THE PEOPLE OF THE STATE OF NEW YORK

-AGAINST-

- X. NICHOLAS COROZZO  
(a.k.a. "NICKY")  
NYSID: 0839483K
- X. BLAISE COROZZO  
(a.k.a. "MISTER")  
NYSID: 1187982K
- X. LOUIS SCIDA  
(a.k.a. "BROTHER")  
NYSID: 0093378L
- X. MICHAEL SCAROLA  
NYSID: 5852623J
- X. NEIL ALTSTATT  
(a.k.a. "BIG NEIL")  
NYSID: 6088510K
- X. TODD SEGARRA  
(a.k.a. "THE KID")  
NYSID: 0526814P
- X. ROBERT MARIETTA  
NYSID: 1011274K
- X. FRANK MANCINI  
NYSID: 7410984J
- X. BENEDICT DELLEANI  
(a.k.a. "BENNY")  
NYSID: 0554224P
- X. CHRIS LANSER  
NYSID: 4104453N
- X. RAFFAELE ROSELLA  
(a.k.a. "RAGU")

FILED:

INDICTMENT NO.  
2982/2007

X. TIMOTHY GLEASON  
NYSID: 6699004K

X. JOSEPH MANTONE  
(a.k.a. "BIG JOE")

X. JOHN BACKER  
NYSID: 1404610N

X. MICHAEL GRILLO

X. JAMES ROSSETTI

X. ROBERT VITA  
NYSID: 5677548Q

X. PASQUALE GUARNIERO  
(a.k.a. "PATTY")  
NYSID: 5417680J

X. ROCCO CALDAROLA  
NYSID: 5804279Q

X. VINCENT CARAVELLO  
(a.k.a. "BIG VINNIE")  
NYSID: 4761614L

X. PAUL TORRES  
NYSID: 1667146N

X. RICARDO BAIRD  
(a.k.a. "RICO")  
NYSID: 0460429H

X. ANTONIO GONZALEZ  
(a.k.a. "TONY")

X. VINCENZO GIUSTO  
(a.k.a. "VINNY")  
NYSID: 8041976Y

X. WILLIAM PEEL

X. CHARLES HACKER  
NYSID: 1798504M

DEFENDANTS.

|  
|  
-X

-----X

|           |   |  |
|-----------|---|--|
| 460.20[1] | Enterprise Corruption (1)                     | (Nicholas Corozzo)<br>(Blaise Corozzo)<br>(Louis Scida)<br>(Michael Scarola)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)<br>(Frank Mancini)<br>(Benedict Delleani)<br>(Chris Lanser)<br>(Raffaele Rosella)<br>(Timothy Gleason)<br>(Joseph Mantone)<br>(John Backer)<br>(Michael Grillo)<br>(James Rossetti)<br>(Robert Vita)<br>(Pasquale Guarniero)<br>(Rocco Caldarola)<br>(Vincent Caravello)<br>(Paul Torres)<br>(Ricardo Baird)<br>(Antonio Gonzalez)<br>(Vincenzo Giusto)<br>(William Peel)<br>(Charles Hacker) |
| 225.10[1] | Promoting Gambling<br>in the First Degree (2) | (Nicholas Corozzo)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)<br>(Frank Mancini)<br>(Benedict Delleani)<br>(Joseph Mantone)<br>(Timothy Gleason)<br>(Raffaele Rosella)<br>(Chris Lanser)  |

---

|           |   |  |
|-----------|---|--|
| 225.10[1] | Promoting Gambling<br>in the First Degree (3) | (Nicholas Corozzo)<br>(Blaise Corozzo)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)<br>(Frank Mancini)  |
| <hr/>     |   | (Benedict Delleani)<br>(Chris Lanser)<br>(Raffaele Rosella)<br>(Timothy Gleason)<br>(Joseph Mantone)<br>(John Backer)  |
| 225.10[1] | Promoting Gambling<br>in the First Degree (4) | (Nicholas Corozzo)<br>(Blaise Corozzo)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)   |
| <hr/>     |   | (Frank Mancini)<br>(Benedict Delleani)<br>(Chris Lanser)<br>(Raffaele Rosella)<br>(Timothy Gleason)<br>(Joseph Mantone)<br>(John Backer)   |
| 225.10[1] | Promoting Gambling<br>in the First Degree (5) | (Nicholas Corozzo)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)   |
| <hr/>     |   | (Frank Mancini)<br>(Joseph Mantone)<br>(Timothy Gleason)<br>(Raffaele Rosella)<br>(Chris Lanser)   |
| 225.10[2] | Promoting Gambling<br>in the First Degree (6) | (Nicholas Corozzo)<br>(Michael Scarola)<br>(Neil Altstatt)<br>(Michael Grillo)<br>(Rocco Caldarola)<br>(Vincenzo Giusto)<br>(Ricardo Baird)<br>(Pasquale Guarniero)<br>(Charles Hacker)<br>(Antonio Gonzalez)<br>(Robert Vita)<br>(James Rossetti) |

225.10[1] Promoting Gambling  
\_\_\_\_\_in the First Degree (7)

(Nicholas Corozzo)  
(Michael Scarola)  
(Neil Altstatt)  
(Todd Segarra)  
(Robert Marietta)  
(Michael Grillo)  
(Rocco Caldarola)  
(Vincenzo Giusto)  
(Paul Torres)  
(Ricardo Baird)  
(Pasquale Guarniero)  
(Charles Hacker)  
(Antonio Gonzalez)  
(Robert Vita)  
(Raffaele Rosella)  
(James Rossetti)

225.10[1] Promoting Gambling  
\_\_\_\_\_in the First Degree (8)

(Nicholas Corozzo)  
(Michael Scarola)  
(Neil Altstatt)  
(Michael Grillo)  
(Rocco Caldarola)  
(Vincenzo Giusto)  
(Ricardo Baird)  
(Pasquale Guarniero)  
(Charles Hacker)  
(Antonio Gonzalez)  
(Robert Vita)  
(James Rossetti)

225.10[1] Promoting Gambling  
\_\_\_\_\_in the First Degree (9)

(Nicholas Corozzo)  
(Michael Scarola)  
(Neil Altstatt)  
(Michael Grillo)  
(Rocco Caldarola)  
(Vincenzo Giusto)  
(Paul Torres)  
(Ricardo Baird)  
(Pasquale Guarniero)  
(Charles Hacker)  
(Antonio Gonzalez)  
(Robert Vita)  
(James Rossetti)

225.10[1] Promoting Gambling  
in the First Degree (10)

---

(Nicholas Corozzo)  
(Blaise Corozzo)  
(Michael Scarola)  
(Neil Altstatt)  
(Todd Segarra)  
(Robert Marietta)  
(Frank Mancini)  
(Benedict Delleani)  
(Chris Lanser)  
(Raffaele Rosella)  
(Timothy Gleason)  
(John Backer)  
(Michael Grillo)  
(James Rossetti)  
(Robert Vita)  
(Pasquale Guarniero)  
(Rocco Caldarola)  
(Paul Torres)  
(Ricardo Baird)  
(Antonio Gonzalez)  
(Vincenzo Giusto)  
(Charles Hacker)

225.10[1] Promoting Gambling  
in the First Degree (11)

---

(Nicholas Corozzo)  
(Neil Altstatt)  
(Todd Segarra)  
(Robert Marietta)  
(Frank Mancini)  
(Joseph Mantone)  
(John Backer)  
(Raffaele Rosella)  
(Chris Lanser)

225.10[1] Promoting Gambling  
in the First Degree (12)

---

(Nicholas Corozzo)  
(Blaise Corozzo)  
(Neil Altstatt)  
(Todd Segarra)  
(Robert Marietta)  
(Frank Mancini)  
(Benedict Delleani)  
(Joseph Mantone)  
(Timothy Gleason)  
(John Backer)  
(Raffaele Rosella)  
(Chris Lanser)

|           |  |  |
|-----------|--|--|
| 225.10[1] | Promoting Gambling<br>in the First Degree (13) | (Nicholas Corozzo)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)<br>(Timothy Gleason)<br>(John Backer)<br>(Raffaele Rosella)<br>(Chris Lanser)   |
| <hr/>     |  |  |
| 225.10[1] | Promoting Gambling<br>in the First Degree (14) | (Nicholas Corozzo)<br>(Blaise Corozzo)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)<br>(Frank Mancini)<br>(Benedict Delleani)<br>(Joseph Mantone)<br>(Timothy Gleason)<br>(John Backer)<br>(Raffaele Rosella)<br>(Chris Lanser) |
| <hr/>     |  |  |
| 225.10[1] | Promoting Gambling<br>in the First Degree (15) | (Nicholas Corozzo)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)<br>(Timothy Gleason)<br>(Raffaele Rosella)<br>(John Backer)<br>(Chris Lanser)   |
| <hr/>     |  |  |
| 225.10[1] | Promoting Gambling<br>in the First Degree (16) | (Nicholas Corozzo)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)<br>(Frank Mancini)<br>(Timothy Gleason)<br>(Raffaele Rosella)<br>(Chris Lanser)   |
| <hr/>     |  |  |
| 225.10[1] | Promoting Gambling<br>in the First Degree (17) | (Nicholas Corozzo)<br>(Michael Scarola)<br>(Neil Altstatt)<br>(Michael Grillo)<br>(Pasquale Guarniero)<br>(Charles Hacker)<br>(Vincent Caravello)<br>(Robert Vita)<br>(James Rossetti)<br>(William Peel)                                     |

|                  |  |   |
|------------------|--|---|
| <u>225.10[1]</u> | Promoting Gambling<br>in the First Degree (18) | (Nicholas Corozzo)<br>(Michael Scarola)<br>(Neil Altstatt)<br>(Michael Grillo)<br>(Paul Torres)<br>(Pasquale Guarniero)<br>(Charles Hacker)<br>(Robert Vita)<br>(Vincent Caravello)<br>(James Rossetti)<br>(William Peel) |
| <u>225.10[1]</u> | Promoting Gambling<br>in the First Degree (19) | (Nicholas Corozzo)<br>(Michael Scarola)<br>(Neil Altstatt)<br>(Michael Grillo)<br>(Paul Torres)<br>(Pasquale Guarniero)<br>(Charles Hacker)<br>(Robert Vita)<br>(Vincent Caravello)<br>(James Rossetti)<br>(William Peel) |
| <u>225.10[1]</u> | Promoting Gambling<br>in the First Degree (20) | (Nicholas Corozzo)<br>(Michael Scarola)<br>(Neil Altstatt)  |
| <u>225.10[1]</u> | Promoting Gambling<br>in the First Degree (21) | (Nicholas Corozzo)<br>(Michael Scarola)<br>(Neil Altstatt)  |
| <u>225.10[1]</u> | Promoting Gambling<br>in the First Degree (22) | (Nicholas Corozzo)<br>(Michael Scarola)<br>(Neil Altstatt)  |
| <u>225.10[1]</u> | Promoting Gambling<br>in the First Degree (23) | (Nicholas Corozzo)<br>(Michael Scarola)<br>(Neil Altstatt)  |
| <u>225.10[1]</u> | Promoting Gambling<br>in the First Degree (24) | (Nicholas Corozzo)<br>(Michael Scarola)<br>(Neil Altstatt)  |
| <u>190.42</u>    | Criminal Usury<br>in the First Degree (25)     | (Nicholas Corozzo)<br>(Louis Scida)   |
| <u>190.42</u>    | Criminal Usury<br>in the First Degree (26)     | (Nicholas Corozzo)<br>(Louis Scida)   |

|              |  |  |
|--------------|--|--|
| 190.42       | Criminal Usury<br>in the First Degree (27) | (Nicholas Corozzo)<br>(Louis Scida)  |
| 155.40[2][a] | Grand Larceny<br>in the Second Degree (28) | (Nicholas Corozzo)<br>(Todd Segarra)   |
| 105.05[1]    | Conspiracy<br>in the Fifth Degree (29)     | (Nicholas Corozzo)<br>(Blaise Corozzo)<br>(Louis Scida)<br>(Michael Scarola)<br>(Neil Altstatt)<br>(Todd Segarra)<br>(Robert Marietta)<br>(Frank Mancini)<br>(Benedict Delleani)<br>(Chris Lanser)<br>(Raffaele Rosella)<br>(Timothy Gleason)<br>(Joseph Mantone)<br>(John Backer)<br>(Michael Grillo)<br>(James Rossetti)<br>(Robert Vita)<br>(Pasquale Guarniero)<br>(Rocco Caldarola)<br>(Vincent Caravello)<br>(Paul Torres)<br>(Ricardo Baird)<br>(Antonio Gonzalez)<br>(Vincenzo Giusto)<br>(William Peel)<br>(Charles Hacker) |

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

DISTRICT ATTORNEY

**COUNT ONE**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants of the crime of **ENTERPRISE CORRUPTION**, committed as follows:

The defendants, each aiding the other and acting in concert, on or about and between November 6, 2005, and January 8, 2008, in the County of Queens and elsewhere, having knowledge of the existence of a Criminal Enterprise, to wit, the Nicholas Corozzo Crew of the Gambino Crime Family, and the nature of its activities, and being employed by and associated with that criminal enterprise, intentionally conducted and participated in the affairs of the criminal enterprise by participating in a pattern of criminal activity, as follows:

**THE CRIMINAL ENTERPRISE**

At all times relevant to Count One:

1. The defendants Nicholas Corozzo (a.k.a. "Nicky"), Michael Scarola, Neil Altstatt (a.k.a. "Big Neil"), Michael Grillo, Rocco Caldarella, Vincenzo Giusto (a.k.a. "Vinnie"), Paul Torres, Ricardo Baird (a.k.a. "Rico"), Pasquale Guarniero (a.k.a. "Patty"), Charles Hacker, Antonio Gonzalez (a.k.a. "Tony"), Robert Vita, Vincent Caravello (a.k.a. "Big Vinnie"), Louis Scida (a.k.a. "Brother"), Blaise Corozzo (a.k.a. "Mister"), Todd Segarra (a.k.a. "The Kid"), Robert Marietta, Frank Mancini, Benedict Delleani (a.k.a. "Benny"), Joseph Mantone (a.k.a. "Big Joe"), Timothy Gleason, John Backer, Raffaele Rosella (a.k.a. "Ragu"), Chris Lanser, James Rossetti, and William Peel, along with other persons known and unknown, were members of or

were associated with an enterprise in which they shared a common purpose of engaging in criminal conduct and were associated in a structure both that was distinct from the pattern of criminal activity and that had a continuity of existence, structure and criminal purpose beyond the scope of individual criminal incidents.

2. The defendants were members of the Nicholas Corozzo Crew of the Gambino Crime Family that operated an unlawful sports gambling, criminal usury, and prostitution enterprise in Queens, Kings, and New York counties, and elsewhere. The Nicholas Corozzo Crew of the Gambino Crime Family constituted a "criminal enterprise" as that term is defined in Penal Law Section 460.10[3].

3. There were other members of the Nicholas Corozzo Crew of the Gambino Crime Family not named herein as defendants, who were employed by or associated with said organization, including Gambino Associates Nicholas Corozzo, Jr., Steven Iaria, James D'Andrea, Louis DeVecchis, Thomas Malley, and Joseph Papaccio.

#### **THE PURPOSE AND STRUCTURE OF THE CRIMINAL ENTERPRISE**

4. The common purpose of the members and associates of the Nicholas Corozzo Crew of the Gambino Crime Family was to engage in criminal conduct and to acquire money illegally through the promotion of gambling activity, including wagers on sports, and through criminal usury, the promotion of prostitution.

5. The Criminal Enterprise consisted of an Organized Crime Family member - Captain Nicholas Corozzo - who profited from each criminal pursuit of any member of this enterprise, and who, through

those designated by him, controlled the day-to-day operation of the gambling portion of the enterprise. Another member of Organized Crime, Gambino Soldier Michael Scarola, operated as a Bookmaker/Agent who interacted with offshore websites and received profits from the gambling accounts of at least seven "runners", and who employed at least six "money collectors". As stated, the Organized Crime Captain controlled and oversaw the enterprise, constituting the final authority on decisions affecting the overall operation of the enterprise. There was a parallel gambling operation run by an Organized Crime Associate, Todd Segarra, who employed a "clerk", defendant Robert Marietta, six "runners", and one "money collector". This traditional gambling operation shared its profits with a Gambino Soldier, Blaise Corozzo, although that Soldier had little control over that operation. Additionally, there was a "collector/messenger", Neil Altstatt, who regularly met with the men acting as bookmakers/agents and conveyed messages from the Captain. This collector/messenger also met with another Gambino Associate, Steven Iaria, who was responsible for making day-to-day decisions pertaining to the various gambling enterprises on behalf of the Captain. The money collectors picked up and delivered gambling proceeds to runners, in order to cover the winnings and profit from the loses of the runners' bettors. The clerk operated a wire room, accepting and coordinating the bets and the laying off of bets. Lastly, the runners provided the bettors with the telephone numbers and access codes for the wire rooms and/or websites, relayed their bettors' wagers themselves to the wire rooms, and met with the bettors in order

to settle their weekly gambling accounts with the enterprise.

a. The Nicholas Corozzo Crew of the Gambino Crime Family conducted this gambling business in the form of a sports gambling operation, as follows:

(i) Bets were accepted by this gambling operation on various sporting events, including professional and college basketball and football, and professional baseball and hockey.

(ii) At various times relevant to this indictment, the Nicholas Corozzo Crew of the Gambino Crime Family accepted these bets via the accounts belonging to its runners: Frank Mancini, Chris Lanser, Benedict Delleani, Timothy Gleason, Joseph Mantone, John Backer, Robert Vita, Rocco Caldarola, Vincent Caravello, Paul Torres, Ricardo Baird, Antonio Gonzalez, Vincenzo Giusto, and Pasquale Guarniero. In other instances, some of the runners, such as Robert Vita, Rocco Caldarola, Vincent Caravello, Paul Torres, Ricardo Baird, Antonio Gonzalez, Vincenzo Giusto, and Pasquale Guarniero, would provide their bettors with the phone number and/or access codes to the websites, so that the bettors could call in their bets themselves or place bets via the Internet, making sure that their bets were accepted under their specific runner's account.

(iii) The bookmakers and agents, Todd Segarra and Michael Scarola, handled the disputes that arose between bettors and runners, as well as, in the traditional wire room, accounting discrepancies between runners and the clerk, Robert Marietta. The bookmakers and agents also managed bettor's limits and the resources

of the operation, including the allocation of personnel of the operation.

(iv) The collectors, Raffaele Rosella, Michael Grillo, James Rossetti, Robert Vita, Pasquale Guarniero, William Peel, and Charles Hacker, on the orders of the bookmakers and agents, shuttled gambling proceeds back and forth between the runners and the bookmaker or agent of the organization. They collected losing wagers from the runners and delivered previously-won gambling proceeds to the runners.

(v) Made member, Captain Nicholas Corozzo, constituted the ultimate decision-making authority in the organization. He exerted his authority in specific instances, regarding the Scarola-managed Internet-based operation, by closing and re-authorizing the opening of Scarola's lucrative gambling accounts. Captain Nicholas Corozzo also profited from the Segarra-managed traditional wire room, as Segarra operated under the aegis of Nicholas Corozzo.

b. Unindicted co-conspirator Steven Iaria is an associate of the Gambino Crime Family, and, as such, controlled the cash flow of both parallel gambling operations on behalf of Nicholas Corozzo. Iaria met with defendants Nicholas Corozzo, Neil Altstatt, Michael Scarola, and Todd Segarra, coordinating communication and money.

c. Defendant Neil Altstatt additionally controlled and managed an adult establishment, Lorri's Lounge and Bikini Bar, in which on-premises prostitution contributed to the daily profits. As a Gambino Associate, Altstatt paid proceeds from this criminal activity

to Gambino Captain Nicholas Corozzo.

**PATTERN OF CRIMINAL ACTIVITY**

6. During the period of these offenses, as indicated below, each of the defendants, with intent to participate in and advance the affairs of the criminal enterprise, engaged in conduct constituting, or was criminally liable for, three or more of the following criminal acts included within an established pattern of criminal activity:

**PATTERN ACT ONE**

The defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, RAFFAELE ROSELLA, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about November 6, 2005, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**PATTERN ACT TWO**

The defendants NICHOLAS COROZZO, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about November 13, 2005, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by

engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**PATTERN ACT THREE**

The defendants NICHOLAS COROZZO, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about November 20, 2005, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT FOUR**

The defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, JOSEPH MANTONE, TIMOTHY GLEASON, RAFFAELE ROSELLA, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about January 8, 2006, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT FIVE**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, and JAMES ROSSETTI, committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about September 25, 2006, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT SIX**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, PAUL TORRES, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, RAFFAELE ROSELLA, JAMES and ROSSETTI, committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about October 1, 2006, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT SEVEN**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, and

JAMES ROSSETTI, committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about October 4, 2006, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**PATTERN ACT EIGHT**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, PAUL TORRES, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, and JAMES ROSSETTI, committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about October 7, 2006, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**PATTERN ACT NINE**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, PAUL TORRES, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, FRANK MANCINI, BENEDICT DELLEANI, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, JAMES ROSSETTI, and CHRIS LANSER, committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law

Section 225.10[1] in that on or about October 8, 2006, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT TEN**

The defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, JOSEPH MANTONE, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about October 15, 2006, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT ELEVEN**

The defendants NICHOLAS COROZZO, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about October 22, 2006, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT TWELVE**

The defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about October 29, 2006, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT THIRTEEN**

The defendants NICHOLAS COROZZO, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about January 1, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT FOURTEEN**

The defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, TIMOTHY GLEASON, RAFFAELE ROSELLA, JOHN BACKER, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about January 7, 2007, in the County of Queens and elsewhere, they knowingly

advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**PATTERN ACT FIFTEEN**

The defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, TIMOTHY GLEASON, RAFFAELE ROSELLA, and CHRIS LANSER committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about January 14, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**PATTERN ACT SIXTEEN**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, PASQUALE GUARNIERO, CHARLES HACKER, ROBERT VITA, VINCENT CARAVELLO, JAMES ROSSETTI, and WILLIAM PEEL committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about September 8, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.\_\_\_\_

**PATTERN ACT SEVENTEEN**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, PAUL TORRES, PASQUALE GUARNIERO, CHARLES HACKER, ROBERT

VITA, VINCENT CARAVELLO, JAMES ROSSETTI, and WILLIAM PEEL committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about September 9, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT EIGHTEEN**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, PAUL TORRES, PASQUALE GUARNIERO, CHARLES HACKER, ROBERT VITA, VINCENT CARAVELLO, JAMES ROSSETTI, and WILLIAM PEEL committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about September 10, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT NINETEEN**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about September 14, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**PATTERN ACT TWENTY**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about September 15, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**PATTERN ACT TWENTY-ONE**

---

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about September 16, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**PATTERN ACT TWENTY-TWO**

---

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about September 17, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT TWENTY-THREE**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law Section 225.10[1] in that on or about September 18, 2007, in the County of Queens and elsewhere, they knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

---

**PATTERN ACT TWENTY-FOUR**

The defendants NICHOLAS COROZZO and LOUIS SCIDA committed the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law Section 190.42 in that on or about and between November 9, 2006, and January 8, 2008, in the County of Queens and elsewhere, they, not being authorized or permitted by law to do so, knowingly charged, took or received any money or other property as interest on the loan or forbearance of any money or other property, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period and their conduct was part of a scheme or business of making or collecting usurious loans.

---

**PATTERN ACT TWENTY-FIVE**

The defendants NICHOLAS COROZZO and LOUIS SCIDA committed the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law Section 190.42 in that on or about and between October 27, 2006, and January 8, 2008, in the County of Queens and elsewhere, they, not being authorized or permitted by law to do so, knowingly charged, took or

received any money or other property as interest on the loan or forbearance of any money or other property, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period and their conduct was part of a scheme or business of making or collecting usurious loans.

---

**PATTERN ACT TWENTY-SIX**

The defendants NICHOLAS COROZZO and LOUIS SCIDA committed the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law Section 190.42 in that on or about and between October 31, 2006, and January 8, 2008, in the County of Queens and elsewhere, they, not being authorized or permitted by law to do so, knowingly charged, took or received any money or other property as interest on the loan or forbearance of any money or other property, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period and their conduct was part of a scheme or business of making or collecting usurious loans.

---

**PATTERN ACT TWENTY-SEVEN**

The defendants NICHOLAS COROZZO and TODD SEGARRA committed the crime of **GRAND LARCENY IN THE SECOND DEGREE** in violation of Penal Law Section 155.40(2)(a) in that on or about and between December 30, 2005, and April 30, 2007, in the County of Queens and elsewhere, they stole property and the property, regardless of its nature and value, was obtained by extortion committed by instilling in the victim a fear that the actor or another person will cause physical injury to some person in the future.

---

**PATTERN ACT TWENTY-EIGHT**

The defendants NICHOLAS COROZZO and NEIL ALTSTATT committed the crime of **PROMOTING PROSTITUTION IN THE THIRD DEGREE** in violation of Penal Law Section 230.25[1] in that on or about April 27, 2006, in the County of Kings and elsewhere, they knowingly advanced or profited from prostitution by managing, supervising, controlling or owning, either alone or in association with others, a house of prostitution or prostitution business or enterprise involving prostitution activity by two or more prostitutes.

---

**PATTERN ACT TWENTY-NINE**

The defendants NICHOLAS COROZZO and NEIL ALTSTATT committed the crime of **PROMOTING PROSTITUTION IN THE THIRD DEGREE** in violation of Penal Law Section 230.25[1] in that on or about August 31, 2007, in the County of Kings and elsewhere, they knowingly advanced or profited from prostitution by managing, supervising, controlling or owning, either alone or in association with others, a house of prostitution or prostitution business or enterprise involving prostitution activity by two or more prostitutes.

---

**PATTERN ACT THIRTY**

The defendants NICHOLAS COROZZO and NEIL ALTSTATT committed the crime of **PROMOTING PROSTITUTION IN THE THIRD DEGREE** in violation of Penal Law Section 230.25[1] in that on or about October 24, 2007, in the County of Kings and elsewhere, they knowingly advanced or profited from prostitution by managing, supervising, controlling or owning, either alone or in association with others, a house of prostitution or

prostitution business or enterprise involving prostitution activity by two or more prostitutes.

**PATTERN ACT THIRTY-ONE**

The defendants NICHOLAS COROZZO, MICHAEL SCAROLA, LOUIS SCIDA, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, PAUL TORRES, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, VINCENT CARAVELLO, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, CHRIS LANSER, JAMES ROSSETTI, and WILLIAM PEEL committed the crime of **CONSPIRACY IN THE FIFTH DEGREE** in violation of Penal Law §105.05[1], in that on or about and between September 27, 2005 and October 19, 2007, in the County of Queens and elsewhere, with intent that conduct constituting a felony, to wit: Promoting Gambling in the First Degree be performed, agreed with one or more persons to engage in or cause the performance of such conduct.

It was a purpose of this conspiracy to acquire money through the operation of an unlawful gambling enterprise involving sports wagers. At all times relevant to this indictment, defendant Nicholas Corozzo profited from and had ultimate authority over this gambling enterprise, which included locations in Queens and on the Internet, in which the bookmaker, Todd Segarra, and agent, Michael Scarola, as well as telephone clerks and offshore websites, would accept illegal wagers.

As part of this conspiracy, and at various times relevant to this indictment, the Nicholas Corozzo Crew of the Gambino Crime Family

accepted these bets via the accounts belonging to its runners: Frank Mancini, Chris Lanser, Benedict Delleani, Timothy Gleason, Joseph Mantone, John Backer, Robert Vita, Rocco Caldarola, Vincent Caravello, Paul Torres, Ricardo Baird, Antonio Gonzalez, Vincenzo Giusto, and Pasquale Guarniero. In other instances, some of the runners, such as Robert Vita, Rocco Caldarola, Vincent Caravello, Paul Torres, Ricardo Baird, Antonio Gonzalez, Vincenzo Giusto, and Pasquale Guarniero, would provide their bettors with the phone number and/or access codes to the websites, so that the bettors could call in their bets themselves or place bets via the Internet, making sure that their bets were accepted under their specific runner's account.

As part of this conspiracy, the bookmakers and agents, Todd Segarra and Michael Scarola, handled the disputes that arose between bettors and runners, as well as - in the traditional wire room - accounting discrepancies between runners and the clerk. The bookmaker and agent also managed bettor's limits and the resources of the operation, including the allocation of personnel of the operation.

As part of this conspiracy, the collectors, Raffaele Rosella, Michael Grillo, James Rossetti, Robert Vita, Pasquale Guarniero, William Peel, and Charles Hacker, on the orders of the bookmaker and agent, shuttled gambling proceeds back and forth between the runners and the bookmaker or agent of the organization. They collected losing wagers from the runners and delivered previously-won gambling proceeds to the runners.

As part of this conspiracy, made member, Captain Nicholas Corozzo, constituted the ultimate decision-making authority in the organization. He exerted his authority in specific instances, regarding the Scarola-managed Internet-based operation, by closing and re-authorizing the opening of Scarola's lucrative gambling accounts. Captain Nicholas Corozzo also profited from the Segarra-managed traditional wire room, as Segarra operated under the aegis of Nicholas Corozzo.

Finally, as part of this conspiracy, unindicted co-conspirator Steven Iaria, as associate of the Gambino Crime Family, controlled the cash flow of both parallel gambling operations on behalf of Nicholas Corozzo. Iaria met with defendants Nicholas Corozzo, Neil Altstatt, Michael Scarola, and Todd Segarra, coordinating communication and money.

#### **OVERT ACTS**

In furtherance of said conspiracy and to effect the objects thereof, and during the course thereof, the following overt acts, among others, were committed:

1. The defendants MICHAEL SCAROLA, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, PAUL TORRES, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, FRANK MANCINI, BENEDICT DELLEANI, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, JAMES ROSSETTI, and CHRIS LANSER on or about October 8, 2006, in the County of Queens and elsewhere, accepted more than five bets totaling in excess of five thousand dollars;

2. The defendants BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA,

ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER, on or about October 22, 2006, in the County of Queens and elsewhere, accepted more than five bets totaling in excess of five thousand dollars; and

3. the defendants Neil Altstatt and Louis Scida, on or about September 29, 2006, in the County of Queens, had a discussion pertaining to a bettor referred to as Bart. Speaking from Queens County, Louis Scida authorized Altstatt to extend the betting limit of a bettor.

#### COUNT TWO

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, RAFFAELE ROSELLA, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about November 6, 2005, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

#### COUNT THREE

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, BLAISE COROZZO, NEIL ALTSTATT, TODD

SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about November 13, 2005, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

#### **COUNT FOUR**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about November 20, 2005, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT FIVE**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, JOSEPH MANTONE, TIMOTHY GLEASON, RAFFAELE ROSELLA, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about January 8, 2006, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT SIX**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, and JAMES ROSSETTI of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 25, 2006, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

### COUNT SEVEN

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, PAUL TORRES, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, RAFFAELE ROSELLA, and JAMES ROSSETTI, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about October 1, 2006, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

### COUNT EIGHT

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, and JAMES ROSSETTI of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about October 4, 2006, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or

accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT NINE**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, PAUL TORRES, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, and JAMES ROSSETTI of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about October 7, 2006, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT TEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, PAUL TORRES, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, FRANK MANCINI, BENEDICT DELLEANI, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, JAMES ROSSETTI, and CHRIS LANSER of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about October 8, 2006, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT ELEVEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, JOSEPH MANTONE, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about October 15, 2006, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT TWELVE**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about October 22, 2006, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT THIRTEEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about October 29, 2006, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT FOURTEEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about January 1, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT FIFTEEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, TIMOTHY GLEASON, RAFFAELE ROSELLA, JOHN BACKER, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about January 7, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT SIXTEEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, TIMOTHY GLEASON, RAFFAELE ROSELLA, and CHRIS LANSER, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about January 14, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT SEVENTEEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, PASQUALE GUARNIERO, CHARLES HACKER, ROBERT VITA, VINCENT CARAVELLO, JAMES ROSSETTI, and WILLIAM PEEL, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 8, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT EIGHTEEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, PAUL TORRES, PASQUALE GUARNIERO, CHARLES HACKER, ROBERT VITA, VINCENT CARAVELLO, JAMES ROSSETTI, and WILLIAM PEEL, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 9, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT NINETEEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, NEIL ALTSTATT, MICHAEL GRILLO, PAUL TORRES, PASQUALE GUARNIERO, CHARLES HACKER, ROBERT VITA, VINCENT CARAVELLO, JAMES ROSSETTI, and WILLIAM PEEL, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 10, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT TWENTY**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 14, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT TWENTY-ONE**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 15, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT TWENTY-TWO**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 16, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling

activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT TWENTY-THREE**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 17, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

**COUNT TWENTY-FOUR**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO, MICHAEL SCAROLA, and NEIL ALTSTATT, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the others and acting in concert with other persons, on or about September 18, 2007, in the County of Queens and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received or accepted on that date more than five bets totaling more than five thousand dollars.

COUNT TWENTY-FIVE

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO and LOUIS SCIDA of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the other and acting in concert with other persons, on or about and between November 9, 2006, January 8, 2008, in the County of Queens and elsewhere, not being authorized or permitted by law to do so, knowingly charged, took or received any money or other property as interest on the loan or forbearance of any money or other property, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period and their conduct was part of a scheme or business of making or collecting usurious loans.

COUNT TWENTY-SIX

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO and LOUIS SCIDA of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the other and acting in concert with other persons, on or about and between October 27, 2006, and January 8, 2008, in the County of Queens and elsewhere, not being authorized or permitted by law to do so, knowingly charged, took or received any money or other property as interest on the loan or forbearance of any money or other property, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period and their conduct was part of a scheme or business of making or collecting usurious loans.

**COUNT TWENTY-SEVEN**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants NICHOLAS COROZZO and LOUIS SCIDA of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** committed as follows:

Defendants, each aiding the other and acting in concert with other persons, on or about and between October 31, 2006, and January 8, 2008, in the County of Queens and elsewhere, not being authorized or permitted by law to do so, knowingly charged, took or received any money or other property as interest on the loan or forbearance of any money or other property, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period and their conduct was part of a scheme or business of making or collecting usurious loans.

**COUNT TWENTY-EIGHT**

THE Grand Jury of the County of Queens, by this indictment, accuse the defendants Nicholas Corozzo and Todd Segarra of the crime of **GRAND LARCENY IN THE SECOND DEGREE** in violation of Penal Law Section 155.40 (2) (a), committed as follows:

The defendants and others known and unknown to the Grand Jury, each aiding the other and acting in concert, on or about and between December 30, 2005, and April 30, 2007, in the County of Queens and elsewhere, stole property, which was obtained by extortion committed by instilling in the victim, who is a person known to the Grand Jury, a fear that the defendants or another person would cause physical injury to some person in the future.

**COUNT TWENTY-NINE**

The Grand Jury of the County of Queens, by this indictment, accuse the defendants of the crime of **CONSPIRACY IN THE FIFTH DEGREE** committed as follows:

The defendants, each aiding the others and acting in concert with other persons, on or about and between September 27, 2005, and October 19, 2007, in the County of Queens and elsewhere, with intent that conduct constituting a felony, to wit: Promoting Gambling in the First Degree, be performed, agreed with one or more persons to engage in or cause the performance of such conduct.

It was a purpose of this conspiracy to acquire money through the operation of an unlawful gambling enterprise involving sports wagers. At all times relevant to this indictment, defendant Nicholas Corozzo profited from and had ultimate authority over this gambling enterprise, which included locations in Queens and on the Internet, in which the bookmaker, Todd Segarra, and agent, Michael Scarola, as well as telephone clerks and offshore websites, would accept illegal wagers.

As part of this conspiracy, and at various times relevant to this indictment, the Nicholas Corozzo Crew of the Gambino Crime Family accepted these bets via the accounts belonging to its runners: Frank Mancini, Chris Lanser, Benedict Delleani, Timothy Gleason, Joseph Mantone, John Backer, Robert Vita, Rocco Caldarola, Vincent Caravello, Paul Torres, Ricardo Baird, Antonio Gonzalez, Vincenzo Giusto, and Pasquale Guarniero. In other instances, some of the runners, such as Robert Vita, Rocco Caldarola, Vincent Caravello, Paul Torres, Ricardo

Baird, Antonio Gonzalez, Vincenzo Giusto, and Pasquale Guarniero, would provide their bettors with the phone number and/or access codes to the websites, so that the bettors could call in their bets themselves or place bets via the Internet, making sure that their bets were accepted under their specific runner's account.

As part of this conspiracy, the bookmaker and agent, Todd Segarra and Michael Scarola, handled the disputes that arose between bettors and runners, as well as - in the traditional wire room - accounting discrepancies between runners and the clerk. The bookmaker and agent also managed bettor's limits and the resources of the operation, including the allocation of personnel of the operation.

As part of this conspiracy, the collectors, Raffaele Rosella, Michael Grillo, James Rossetti, Robert Vita, Pasquale Guarniero, William Peel, and Charles Hacker, on the orders of the bookmaker and agent, shuttled gambling proceeds back and forth between the runners and the bookmaker or agent of the organization. They collected losing wagers from the runners and delivered previously-won gambling proceeds to the runners.

As part of this conspiracy, made member, Captain Nicholas Corozzo, constituted the ultimate decision-making authority in the organization. He exerted his authority in specific instances, regarding the Scarola-managed Internet-based operation, by closing and re-authorizing the opening of Scarola's lucrative gambling accounts. Captain Nicholas Corozzo also profited from the Segarra-managed traditional wire room, as Segarra operated under the aegis of Nicholas Corozzo.

Finally, as part of this conspiracy, unindicted co-conspirator Steven Iaria, as associate of the Gambino Crime Family, controlled the cash flow of both parallel gambling operations on behalf of Nicholas Corozzo. Iaria met with defendants Nicholas Corozzo, Neil Altstatt, Michael Scarola, and Todd Segarra, coordinating communication and money.

#### OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, and during the course thereof, the following overt acts, among others, were committed:

1. The defendants MICHAEL SCAROLA, BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, MICHAEL GRILLO, ROCCO CALDAROLA, VINCENZO GIUSTO, PAUL TORRES, RICARDO BAIRD, PASQUALE GUARNIERO, CHARLES HACKER, ANTONIO GONZALEZ, ROBERT VITA, FRANK MANCINI, BENEDICT DELLEANI, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, JAMES ROSSETTI, and CHRIS LANSER, on or about October 8, 2006, in the County of Queens and elsewhere, accepted more than five bets totaling in excess of five thousand dollars;

2. The defendants BLAISE COROZZO, NEIL ALTSTATT, TODD SEGARRA, ROBERT MARIETTA, FRANK MANCINI, BENEDICT DELLEANI, JOSEPH MANTONE, TIMOTHY GLEASON, JOHN BACKER, RAFFAELE ROSELLA, and CHRIS LANSER, on or about October 22, 2006, in the County of Queens and elsewhere, accepted more than five bets totaling in excess of five thousand dollars; and

3. the defendants Neil Altstatt and Louis Scida, on or about September 29, 2006, in the County of Queens, had a discussion pertaining to a bettor referred to as Bart. Speaking from Queens County, Louis Scida authorized Altstatt to extend the betting limit of a bettor.

DISTRICT ATTORNEY