

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

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

-against-

JOHN J. LAFORTE,
ANTHONY J. CINQUE, JR.,
JOHN MATERA,
EDWARD A. LAFORTE,
FREDERICK P. FALCONE, SR.,
GIULIO POMPONIO,
CHARLES FUSCO,
DANIEL F. BOGAN,
ROBERT W. CARTER,
LOUIS A. PALOMBO,
ARTHUR GELLER,
DANIEL M. SCARABAGGIO,
DANIEL H. SHAH,
VINCENT J. RICCIARDI,
AMY L. MCLAUGHLIN,
FREDERICK FALCONE, JR.,
JAMES MIRANDA,

INDICTMENT NO.
-2024

FILED:
FILE NO.:

***SEALED AS TO ALL
COUNTS
OFFICE ORIGIN***

DEFENDANTS.

-----X

COUNT 1

ENTERPRISE CORRUPTION

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., JOHN MATERA, EDWARD A. LAFORTE, FREDERICK P. FALCONE, SR., GIULIO POMPONIO, CHARLES FUSCO, DANIEL F. BOGAN, ROBERT W. CARTER, LOUIS A. PALOMBO, ARTHUR GELLER, DANIEL M. SCARABAGGIO,**

DANIEL H. SHAH, VINCENT J. RICCIARDI, AMY L. MCLAUGHLIN, and JAMES MIRANDA of the crime of ENTERPRISE CORRUPTION, in violation of Penal Law § 460.20(1)(a), committed in Richmond County and elsewhere inside and outside the State of New York, including the State of New Jersey, as follows:

The defendants, from on or about and between July 1, 2021 to June 6, 2023, having knowledge of the existence of a criminal enterprise, to wit: **THE LAFORTE CRIMINAL ENTERPRISE** (hereinafter, “THE CRIMINAL ENTERPRISE”), and the nature of its activities, and being employed by or 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 the First Count:

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., JOHN MATERA, EDWARD A. LAFORTE, FREDERICK P. FALCONE, SR., GIULIO POMPONIO, CHARLES FUSCO, DANIEL F. BOGAN, ROBERT W. CARTER, LOUIS A. PALOMBO, ARTHUR GELLER, DANIEL M. SCARABAGGIO, DANIEL H. SHAH, VINCENT J. RICCIARDI, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, along with other persons known and unknown, were members and/or associates of an enterprise referred to herein as THE CRIMINAL ENTERPRISE, which consisted of a group of persons sharing a common purpose of engaging in criminal conduct. THE CRIMINAL ENTERPRISE had an ascertainable structure that was distinct from a pattern of criminal activity, and had a continuity

of existence, structure, and criminal purpose beyond the scope of individual criminal incidents.

The defendants listed under Count One were members of THE CRIMINAL ENTERPRISE, an organized illegal loansharking and illegal gambling network that operated in Richmond County and elsewhere inside and outside of State of New York, including the State of New Jersey. THE CRIMINAL ENTERPRISE constituted a “criminal enterprise” as the term is defined in Penal Law § 460.10(3).

Many members of THE CRIMINAL ENTERPRISE consisted of members and associates of the Gambino Crime Family. The Gambino Crime Family is one of the five traditional Organized Crime families operating in the New York area and elsewhere in the United States and abroad. The other four families are the Bonanno Crime Family, Colombo Crime Family, Genovese Crime Family, and Lucchese Crime Family. The families are part of a criminal network variously known as “the Mafia,” “the Mob,” and “La Cosa Nostra.”

These Organized Crime families seek to be a secret society of individuals that follow a hierarchical structure, which is headed by a “boss.” The “boss” is assisted by an “underboss” or “street boss,” and by a counselor and mediator known as a “consigliere.” The Gambino Crime Family, as the other four families, operate through groups of individuals known as “crews.” Each “crew” is led by a captain or “capo” or “capo de regime.” The crew consists of “soldiers” and “associates.” The positions of “boss,” “underboss/street boss,” “consigliere,” “capo,” and “soldier” are considered “made members,” “friends of ours,” or “wise guys,” having taken an oath to put the

interests of the crime family above their own individual interests. A “capo” typically has at least two “soldiers” who report to and serve him, but it could be many more. “Soldiers” try to insulate and protect their “capo.” In addition to “made members,” each crew has “associates” who are sometimes referred to as being “connected” or identified as being “with” the “soldiers” and/or “capo.” The “associates” report to and serve a “soldier.” The “associates” engage in the day-to-day criminal activities of the crew and seek to insulate and protect the “made members.”

During on or about and between July 1, 2021 to June 6, 2023, the defendants **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., and JOHN MATERA** held the rank of “soldier” in the Gambino Crime Family. They delegated the oversight of certain activities of THE CRIMINAL ENTERPRISE to **EDWARD A. LAFORTE**, an “associate,” who was aided in the criminal endeavors relating to illegal loansharking and illegal gambling by other Gambino Crime Family “associates” (**FREDERICK P. FALCONE, SR., GIULIO POMPONIO, and DANIEL F. BOGAN**), as well as Colombo associate (**CHARLES FUSCO**), and other participants (**ROBERT W. CARTER, LOUIS A. PALOMBO, ARTHUR GELLER, DANIEL M. SCARABAGGIO, DANIEL H. SHAH, VINCENT J. RICCIARDI, AMY L. MCLAUGHLIN, and JAMES MIRANDA**), who functioned as a part of THE CRIMINAL ENTERPRISE by engaging in shared criminal activities and purposes in furtherance of illegal loansharking and illegal gambling. These “made members,” “associates,” other participants, and co-conspirators comprised THE CRIMINAL ENTERPRISE.

The Structure and Purpose of the Criminal Enterprise

The common purpose of THE CRIMINAL ENTERPRISE was to make money through illegal activities, including illegal loansharking (Criminal Usury in the First Degree) and illegal gambling (Promoting Gambling in the First Degree). The defendants and others associated with them engaged in surreptitious conduct and coded communication to try to prevent law enforcement from detecting their identities and their illegal conduct. It was the common purpose of the members of THE CRIMINAL ENTERPRISE to operate an illegal gambling and loansharking operation to generate money for its members through the specialized roles of each defendant in the enterprise. Additionally, it was the common purpose of the enterprise to conceal its illegal conduct from law enforcement agencies, protect the enterprise from infiltration by law enforcement, and conceal and preserve the proceeds of the illegal activities by its members. The participants of this enterprise coordinated their activities to achieve its common purpose through a hierarchical structure.

From approximately July 1, 2021 to June 6, 2023, THE CRIMINAL ENTERPRISE accounted for weekly usurious loan payments on a principal loan figure of approximately \$500,000 in usurious loans. From approximately September 15, 2022 to March 29, 2023, THE CRIMINAL ENTERPRISE accounted for over seventy bettors who placed approximately \$22,753,964 in illegal wagers on sporting events under **EDWARD A. LAFORTE**'s Master Agent account through an illegal gambling website, www.ubet1288.com.

The conduit of THE CRIMINAL ENTERPRISE was **EDWARD A. LAFORTE**. In both the illegal loansharking activities and illegal gambling activities, **EDWARD A. LAFORTE** was obligated to earn for soldiers **JOHN J. LAFORTE** and **ANTHONY J. CINQUE, JR.** To accomplish this objective, **EDWARD A. LAFORTE** employed, and collected proceeds from, sheetholders within the illegal gambling activities. Additionally, **EDWARD A. LAFORTE** and **FREDERICK P. FALCONE, SR.** collected usurious loan payments from loansharking victims that both **FREDERICK P. FALCONE, SR.**, and **EDWARD A. LAFORTE** provided usurious loans to, respectively and collectively. These proceeds were delivered by **EDWARD A. LAFORTE** and **AMY L. MCLAUGHLIN** to **ANTHONY J. CINQUE, JR.** at Auto Lounge of Edison, 540 US-1 Edison, New Jersey 08817, a used car dealership, which is partly owned by **ANTHONY J. CINQUE, JR.** Additionally, at times, **EDWARD A. LAFORTE** would leave proceeds of the illegal loansharking and illegal gambling activities at Frank and Danny's Pizzeria, 4369 Amboy Road, Staten Island, New York 10312.

The Loansharking Conspiracy

With respect to the illegal loansharking operation, **EDWARD A. LAFORTE** and **FREDERICK P. FALCONE, SR.** worked collectively as loan sharks within THE CRIMINAL ENTERPRISE. In some instances, they shared loansharking victims. Both maintained detailed loansharking ledgers that included names of victims and their respective usurious loan amounts. The respective ledgers also detailed the weekly usurious loan payments to be made by the loansharking victims.

The weekly interest charge is called the vigorish. Also, known as the “vig” or the “juice” and is measured in “points,” a term that is used to describe a percentage point.

FREDERICK P. FALCONE, SR. had the practice of meeting his loansharking victims at the Eltingville Shopping Center, the Greenridge Shopping Center (both in Richmond County), his residence, and/or the loansharking victim’s residence.

EDWARD A. LAFORTE had the practice of meeting his loansharking victims at China Chalet, 4326 Amboy Road, Staten Island, New York (a restaurant in Richmond County), his residence and/or the loansharking victim’s residence. Additionally,

EDWARD A. LAFORTE instructed and instilled the practice with his loansharking victims to leave their usurious loan payments at China Chalet or his residence for future collection by **EDWARD A. LAFORTE, AMY L. MCLAUGHLIN** or **JAMES MIRANDA** (McLaughlin’s son). **FREDERICK P. FALCONE, SR.** and **EDWARD A. LAFORTE** functioned as collectors and/or recipients of weekly usurious loan payments by urging loan shark victims to pay debts in a timely manner within THE CRIMINAL ENTERPRISE. At times, **FREDERICK P. FALCONE, SR.** and **EDWARD A. LAFORTE** needed the authorization of **JOHN J. LAFORTE** and **ANTHONY J. CINQUE, JR.** to disperse the loans. In some instances, **JOHN J. LAFORTE** and **ANTHONY J. CINQUE, JR.** funded the disbursement of the usurious loan figures within THE CRIMINAL ENTERPRISE. **FREDERICK P. FALCONE, SR.** and **EDWARD A. LAFORTE** would meet weekly to discuss and exchange money for both the illegal loansharking and illegal gambling operations.

The Illegal Gambling Conspiracy

With respect to the illegal gambling operation, **EDWARD A. LAFORTE** maintained a managerial role of **THE CRIMINAL ENTERPRISE**. As manager, **EDWARD A. LAFORTE** had access to Master Agent gambling account credentials, named “sharkma” through the illegal gambling website, www.ubet1288.com. In this role, **EDWARD A. LAFORTE** managed sheetholders and bettors, including providing each with their own combination of account username and password. **EDWARD A. LAFORTE** also paid the illegal gambling website to allow his bettors and sheetholders to continually use the platform. **AMY L. MCLAUGHLIN** assisted **EDWARD A. LAFORTE** in maintaining, organizing, and keeping records, as well as collecting and distributing proceeds of the illegal gambling activities.

JOHN J. LAFORTE operated and acted in a supervisory role over **EDWARD A. LAFORTE**’s Master Agent gambling account. In this role, **JOHN J. LAFORTE** assisted in making decisions on issues arising out of this gambling operation within **THE CRIMINAL ENTERPRISE**. As Master Agent, **EDWARD A. LAFORTE** was financially responsible to provide proceeds of **THE CRIMINAL ENTERPRISE** to both **JOHN J. LAFORTE** and **ANTHONY J. CINQUE, JR.** Additionally, **JOHN J. LAFORTE** and **ANTHONY J. CINQUE, JR.** would also fund a portion of the illegal gambling activities to assist with the payment of winning bettors.

EDWARD A. LAFORTE, using his Master Agent account, employed and supervised several sheetholders. A sheetholder is an employee of a gambling operation who typically manages the bets and collections for a number of individual bettors. Sheetholders, also known as “runners” or “agents,” may have a “quarter-

sheet” or a “half-sheet,” terms which indicate the amount of the sheetholder’s commission on bets made through the bookmaker. The half-sheet is a 50-50 partnership with the bookmaker. A quarter-sheet means the sheetholder receives or pays 25 percent, while the bookmaker takes or pays 75 percent.

The sheetholders identified in THE CRIMINAL ENTERPRISE are **CHARLES FUSCO, ROBERT W. CARTER, GIULIO POMPONIO, ARTHUR GELLER, DANIEL M. SCARABAGGIO, DANIEL H. SHAH, VINCENT J. RICCIARDI, FREDERICK P. FALCONE SR., LOUIS A. PALOMBO,** and **DANIEL F. BOGAN.** Daily, these sheetholders managed their bettors and contacted **EDWARD A. LAFORTE** with issues related to these bettors. The sheetholders also collected each bettor’s financial losses and provided payment to the bettors if they won. The weekly figure for each bettor was provided to their respective sheetholder by **EDWARD A. LAFORTE,** and many times with the assistance of **AMY L. MCLAUGHLIN.** Additionally, **JOHN MATERA** reviewed weekly winnings and losses within the illegal gambling operation with other members of THE CRIMINAL ENTERPRISE. **JOHN MATERA** also reviewed weekly bettor credit limits with other members of THE CRIMINAL ENTERPRISE to discuss how much a bettor can continue to risk.

In both the illegal loansharking and illegal gambling operations, **AMY L. MCLAUGHLIN** acted as record keeper, assisting **EDWARD A. LAFORTE** in his role in THE CRIMINAL ENTERPRISE. **AMY L. MCLAUGHLIN**’s son, **JAMES MIRANDA,** also participated in THE CRIMINAL ENTERPRISE. **JAMES**

MIRANDA acted as a courier collecting and distributing proceeds of both the illegal loansharking and illegal gambling activities. **EDWARD A. LAFORTE** and **AMY L. MCLAUGHLIN** would direct **JAMES MIRANDA** to meet with sheetholders and loansharking victims when they were unavailable.

PATTERN OF CRIMINAL ACTIVITY

During the charged period of **THE CRIMINAL ENTERPRISE**, the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., JOHN MATERA, EDWARD A. LAFORTE, FREDERICK P. FALCONE, SR., GIULIO POMPONIO, CHARLES FUSCO, DANIEL F. BOGAN, ROBERT W. CARTER, LOUIS A. PALOMBO, ARTHUR GELLER, DANIEL M. SCARABAGGIO, DANIEL H. SHAH, VINCENT J. RICCIARDI, AMY L. MCLAUGHLIN,** and **JAMES MIRANDA**, along with other persons known and unknown, with intent to participate in and advance from the affairs of **THE CRIMINAL ENTERPRISE** and pursuant to a common scheme and plan, engaged in conduct constituting or were criminally liable for the following criminal acts including within a pattern of criminal activity.

Loansharking

PATTERN ACT 1 **(Related to Victim 1¹)**

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN,** and **JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the

¹ Victim 1 is known to the members of the Grand Jury.

Grand Jury, committed the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendants, from on or about June 24, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

PATTERN ACT 2
(Related to Victim 2²)

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendants, from on or about June 1, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of

² Victim 2 is known to the members of the Grand Jury.

any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

PATTERN ACT 3
(Related to Victim 3³)

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, and FREDERICK P. FALCONE, SR.**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 190.42 as follows:

The defendants, from on or about January 17, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

PATTERN ACT 4
(Related to Victim 4⁴)

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the

³ Victim 3 is known to the members of the Grand Jury.

⁴ Victim 4 is known to the members of the Grand Jury.

Grand Jury, committed the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendants, from on or about December 4, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

PATTERN ACT 5
(Related to Victim 7⁵)

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendants, from on or about October 10, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of

⁵ Victim 7 is known to the members of the Grand Jury.

any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

PATTERN ACT 6
(Related to Victim 9⁶)

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 190.42 as follows:

The defendants, from on or about October 31, 2021 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

PATTERN ACT 7
(Related to Victim 10⁷)

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, FREDERICK P. FALCONE, SR., and AMY L. MCLAUGHLIN**, each aiding and acting in concert with each other and others known

⁶ Victim 9 is known to the members of the Grand Jury.

⁷ Victim 10 is known to the members of the Grand Jury.

and unknown to the Grand Jury, committed the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendants, from on or about January 10, 2023 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

PATTERN ACT 8

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, FREDERICK P. FALCONE, SR., AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of CONSPIRACY IN THE FOURTH DEGREE in violation of Penal Law § 105.10(1), as follows:

The defendants, from on or about July 1, 2021 through June 6, 2023, in the County of Richmond, and elsewhere, inside and outside the State of New York, with intent that conduct constituting a class C felony, to wit: CRIMINAL USURY IN THE FIRST DEGREE (Penal Law § 190.42), be performed, agreed with one or more persons to engage in or cause the performance of such conduct, as charged in Count 2 of this Indictment.

Bookmaking

PATTERN ACT 9

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., ARTHUR GELLER, CHARLES FUSCO,** and **DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about April 20, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 10

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., ARTHUR GELLER, CHARLES FUSCO,** and **DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about May 3, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 11

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., ARTHUR GELLER, CHARLES FUSCO, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about June 11, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 12

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, ARTHUR GELLER, CHARLES FUSCO, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand

Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about July 16, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York knowingly advanced or 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 13

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., CHARLES FUSCO, JOHN MATERA, DANIEL H. SHAH, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about August 25, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 14

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER,**

FREDERICK P. FALCONE, SR., GIULIO POMPONIO, CHARLES FUSCO, JOHN MATERA, DANIEL H. SHAH, and DANIEL F. BOGAN, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about September 15, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 15

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., GIULIO POMPONIO, CHARLES FUSCO, JOHN MATERA, DANIEL F. BOGAN, VINCENT J. RICCIARDI, and LOUIS A. PALOMBO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about September 18, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 16

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., CHARLES FUSCO, JOHN MATERA, DANIEL F. BOGAN, VINCENT J. RICCIARDI, LOUIS A. PALOMBO,** and **DANIEL M. SCARABAGGIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 1, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 17

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., CHARLES FUSCO, JOHN MATERA, GIULIO POMPONIO, DANIEL F. BOGAN, VINCENT J. RICCIARDI, LOUIS A. PALOMBO,** and **DANIEL M. SCARABAGGIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury,

committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 9, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 18

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., CHARLES FUSCO, JOHN MATERA, GIULIO POMPONIO, DANIEL F. BOGAN, VINCENT J. RICCIARDI,** and **LOUIS A. PALOMBO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about November 27, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 19

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., CHARLES FUSCO, JOHN MATERA, GIULIO POMPONIO, DANIEL F. BOGAN, VINCENT J. RICCIARDI,** and **LOUIS A. PALOMBO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 18, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 20

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, FREDERICK P. FALCONE, SR., CHARLES FUSCO, GIULIO POMPONIO, DANIEL F. BOGAN,** and **VINCENT J. RICCIARDI,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about February 12, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, knowingly advanced or 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 21

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JOHN MATERA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 4, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 22

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and GIULIO POMPONIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about November 26, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 23

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and CHARLES FUSCO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about May 7, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 24

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about January 22, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 25

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and ROBERT W. CARTER**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 23, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 26

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and LOUIS A. PALOMBO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about November 13, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 27

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and ARTHUR GELLER**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about June 4, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 28

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL M. SCARABAGGIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING

GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 8, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 29

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL H. SHAH**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about August 27, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 30

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and VINCENT J. RICCIARDI**, each aiding and acting in concert with each other and others known

and unknown to the Grand Jury, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about February 11, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 31

The defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, ARTHUR GELLER, FREDERICK P. FALCONE, SR., CHARLES FUSCO, JOHN MATERA, DANIEL H. SHAH, GIULIO POMPONIO, DANIEL F. BOGAN, VINCENT J. RICCIARDI, LOUIS A. PALOMBO, DANIEL M. SCARABAGGIO,** and **JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of CONSPIRACY IN THE FIFTH DEGREE in violation of Penal Law §105.05(1), as follows:

The defendants, from on or about April 14, 2022 to May 23, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, with intent that conduct constituting a felony be performed, to wit: PROMOTING GAMBLING IN THE FIRST DEGREE (Penal Law § 225.10(1)), agreed with one or more persons

to engage in or cause the performance of such conduct, as charged in Count 30 of this Indictment.

COUNT 2

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, FREDERICK P. FALCONE, SR., AMY L. MCLAUGHLIN, FREDERICK FALCONE, JR.,** and **JAMES MIRANDA**, acting in concert with each other and others both known and unknown to the Grand Jury, of the crime of CONSPIRACY IN THE FOURTH DEGREE, in violation of New York State Penal Law § 105.10(1), committed as follows:

The defendants, from on or about July 1, 2021 through June 6, 2023, in the County of Richmond, and elsewhere, with intent that conduct constituting a class C felony, to wit: CRIMINAL USURY IN THE FIRST DEGREE (Penal Law § 190.42), be performed, agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of this conspiracy to operate an illegal loansharking operation in which the participants oversaw, procured, offered, delivered, and collected the proceeds of illegal usurious loans.

It was the role of **FREDERICK P. FALCONE, SR.** and **EDWARD A. LAFORTE** to function as collectors and/or recipients of weekly usurious loan payments by urging loan shark victims to pay debts in a timely manner.

FREDERICK P. FALCONE, SR. and **EDWARD A. LAFORTE** needed the authorization of **JOHN J. LAFORTE** and **ANTHONY J. CINQUE, JR.** to disperse the loans. **JOHN J. LAFORTE** and **ANTHONY J. CINQUE, JR.** funded the disbursement of the usurious loan figures.

FREDERICK P. FALCONE, SR. had the practice of meeting his loansharking victims at agreed upon locations. For a time period, **FREDERICK FALCONE, JR.** maintained the same role and same practice for **FREDERICK P. FALCONE, Sr.** **EDWARD A. LAFORTE** had the practice of meeting his loansharking victims at agreed upon locations. It was the role of **AMY L. MCLAUGHLIN** and/ or **JAMES MIRANDA** to assist in collecting weekly payments from loan shark victims on **EDWARD A. LAFORTE's** behalf.

It was also a part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicating in a guarded, cryptic manner.

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. On or about June 21, 2022, in Richmond County, New York, **EDWARD A. LAFORTE** had a telephone conversation with Victim 2, during which **EDWARD A. LAFORTE** stated, in sum and substance, "Let's call it fifty" and "Yeah, let's call it two and a half, right? I don't wanna talk anymore than that. Two and a half, it's

twelve fifty a week” whereupon Victim 2 stated, in sum and substance, “No, I get it, I get it.”

2. On or about June 24, 2022, in Richmond County, New York, **EDWARD A. LAFORTE** had a telephone conversation with Victim 1, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “I got eight. So, eight and twelve, is two—” and “so we’ll figure it all out. You know what it is, two and a half, all right, all right, all right—”, whereupon Victim 1 stated, in sum and substance, “I got everything. Bye, bye, thank you.”

3. On or about June 24, 2022, in Richmond County, New York, **EDWARD A. LAFORTE** had a telephone conversation with **JAMES MIRANDA**, during which, **JAMES MIRANDA** stated, in sum and substance, “No, I, I, put it in the mailbox. I put it under his other package that was in the mailbox” and **EDWARD A. LAFORTE** replied, in sum and substance, “That’s eight- there’s eight thousand dollars there brother. He, he’s asking where it is. He can’t find it.”

4. On or about August 15, 2022, in Richmond County, New York, **ANTHONY J. CINQUE, JR.** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **ANTHONY J. CINQUE, JR.** stated, in sum and substance, “Yeah, I’m going to be here” and **EDWARD A. LAFORTE** replied, in sum and substance, “I’m coming over the bridge soon.”

5. On or about August 15, 2022, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with **EDWARD A. LAFORTE**, during which **JOHN J. LAFORTE** stated, in sum and substance, “No just that, that

paperwork was wrong that you brought there it wasn't, it was, it was wrong, so you know" whereupon during the telephone conversation, **EDWARD A. LAFORTE** stated, in sum and substance, "Yeah, I'm thinking, oh, oh yes John I, I know what I did, I didn't pay, I know."

6. On or about October 4, 2022, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE**, stated in sum and substance, "[Victim 7] wants to talk to me, is that all right?" and **JOHN J. LAFORTE** replied in sum and substance, "No, no he's a flounderer" and "Nah, he's a no, I mean that's up to you Ed."

7. On or about December 3, 2022, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with Victim 4, during which Victim 4 stated, in sum and substance, "Yeah, No, I'm good. Everything is good I just need a, a helping hand" and **JOHN J. LAFORTE** replied, in sum and substance, "Oh, all right [Victim 4]. Yeah, catch me, you catch me, you'll catch me."

8. On or about December 4, 2022, in Richmond County, New York, **JOHN J. LAFORTE** met with Victim 4.

9. On or about December 4, 2022, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **JOHN J. LAFORTE** stated, in sum and substance, "Just give my, [Victim 4] like five minutes of your time. He's a good, good, my good pal. All right?" and **EDWARD A. LAFORTE** replied, in sum and substance, "Yeah, now. Yeah."

10. On or about October 30, 2022, in Richmond County, New York, **FREDERICK FALCONE, JR.** met with Victim 3, to collect a weekly interest payment.

11. On or about November 3, 2022, in Richmond County, New York, **FREDERICK FALCONE, JR.** met with Witness 2,⁸ to collect a weekly interest payment, during which Witness 2 paid the full principal amount of the loan.

12. On or about November 3, 2022, in Richmond County, New York, **FREDERICK FALCONE, JR.** met with Witness 1,⁹ during which Witness 1 requested a loan from both **FREDERICK P. FALCONE, SR.** and **FREDERICK FALCONE, JR.**

13. On or about November 29, 2022, in Richmond County, New York, **JAMES MIRANDA** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **JAMES MIRANDA** stated, in sum and substance, “I know, I know I messed up” whereupon **EDWARD A. LAFORTE** stated during the conversation, in sum and substance, “Jesus Christ you don’t realize the magnitude of this he owed me tens and twenties of thousands of dollars, all right, bye.”

14. On or about January 9, 2023, in Richmond County, New York, **FREDERICK P. FALCONE, SR.** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **FREDERICK P. FALCONE, SR.** stated, in sum and substance, “yeah, yeah, it’s you know, I’ll explain when I see you. I went to see him. He’s good. We’re good” and **EDWARD A. LAFORTE** replied, in sum and substance, “All right, so do you want me, do you want me to talk to him—”

⁸ Witness 2 is known to members of the Grand Jury.

⁹ Witness 1 is known to members of the Grand Jury.

15. On or about January 10, 2023, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “I gotta go to Secaucus first and the I gotta go- I spoke to Freddy, I gotta go to Edison after that” and **JOHN J. LAFORTE** replied, in sum and substance, “Oh, yeah, did you meet the [Victim 10]” and **EDWARD A. LAFORTE** replied, in sum and substance, “Yeah, he’s good he said but, I’m gonna, I’m gonna, I’m gonna be there when it actually happens, but he said it’s good” and **JOHN J. LAFORTE** replied, in sum and substance, “Very good, all right, okay. That’s what I was call[ed].”

16. On or about January 28, 2023, in Richmond County, New York, **JAMES MIRANDA** had a telephone conversation with **EDWARD A. LAFORTE**, during which **JAMES MIRANDA** listed, in sum and substance, names and financial figures from envelopes he collected for **EDWARD A. LAFORTE**, whereupon **EDWARD A. LAFORTE** stated, in sum and substance, “You’re on point brother, man you’re made for this kind of thing.”

17. On or about March 1, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** had a telephone conversation with **JOHN J. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “I spoke to [Victim 9]. I’ll talk to you about, and we’ll get together with him, and see what he’s got to say, all right?” and **JOHN J. LAFORTE** replied, in sum and substance, “well, for me and you to talk, but whatever...”

18. On or about March 6, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** had a telephone conversation with **ANTHONY J. CINQUE, JR.**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “So, I, I...so, I saw my brother, and that’s it, but I need to, I need to, I got, if you have time tomorrow, I want to come and talk to you about something” and **ANTHONY J. CINQUE, JR.** replied, in sum and substance, “All right, I’ll see you later.”

19. On or about March 7, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** sent an SMS message, which read in sum and substance, “What's up Anthony it's Eddie I'm just heading over the bridge I just wanted to make sure that you were there” and **ANTHONY J. CINQUE, JR.** replied in SMS, which read in sum and substance, “Yes I’m here.”

20. On or about March 7, 2023, in the State of New Jersey, **EDWARD A. LAFORTE** met with **ANTHONY J. CINQUE, JR.** at Auto Lounge of Edison, 540 US-1, Edison, New Jersey.

21. On or about March 7, 2023, **EDWARD A. LAFORTE** sent an SMS message to Victim 9, which read in sum and substance, “[Victim 9] I was able to take care of that 10 for tomorrow[.]”

22. On or about April 3, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** and **AMY L. MCLAUGHLIN**, had a conversation, during which, **AMY L. MCLAUGHLIN** stated, in sum and substance, “What on Mondays?” and **EDWARD A. LAFORTE** replied, in sum and substance, “Anthony.” Later in the conversation, **AMY L. MCLAUGHLIN** stated, in sum and substance, “I have thirty-

five, fifty-five. 39 of 40 for the six hundred and 24 of 52 for five hundred” and **EDWARD A. LAFORTE** replied, in sum and substance, “And we give him twenty-four, fifty-five now?”

23. On or about April 4, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** and **AMY L. MCLAUGHLIN**, had a conversation, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Anthony’s holding the bank book because with the six hundred I keep paying. Every month, it’s twenty-five hundred” and **AMY L. MCLAUGHLIN** replied, in sum and substance, “Right.”

24. On or about April 28, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** was recorded stating, in sum and substance, “And John don’t ask for nothing. But John gets, John’s the one that’s getting the point sharing with Anthony, nobody else. They, they know that I’m solid.”

25. On or about May 11, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** and **AMY L. MCLAUGHLIN**, had a conversation, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Do you remember did you put Anthony Cinque on anything?” and **AMY L. MCLAUGHLIN** replied, in sum and substance, “No, I put A on top” and “I didn’t put Danny and Freddy, only put the initials.”

COUNT 3
(Related to Victim 1)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE**, **ANTHONY J. CINQUE, JR.**, **EDWARD A. LAFORTE**, **AMY L. MCLAUGHLIN**, and **JAMES MIRANDA**, each aiding and

acting in concert with each other and others known and unknown to the Grand Jury, of the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendants, from on or about June 24, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 4
(Related to Victim 1)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of CRIMINAL USURY IN THE SECOND DEGREE in violation of Penal Law § 190.40 as follows:

The defendants, from on or about June 24, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or

forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 5
(Related to Witness 1)

The Grand Jury of Richmond County, by this Indictment, accuses the defendant, **FREDERICK P. FALCONE, SR.**, of the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendant, from on or about December 22, 2021 through July 28, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 6
(Related to Witness 1)

The Grand Jury of Richmond County, by this Indictment, accuses the defendant, **FREDERICK P. FALCONE, SR.** of the crime of CRIMINAL USURY IN THE SECOND DEGREE in violation of Penal Law § 190.40 as follows:

The defendant, from on or about December 22, 2021 through July 28, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding

twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 7
(Related to Witness 1)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **FREDERICK P. FALCONE, SR.** and **FREDERICK FALCONE, JR.**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendants, from on or about November 3, 2022 through January, 14, 2024, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 8
(Related to Witness 1)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **FREDERICK P. FALCONE, SR.** and **FREDERICK FALCONE, JR.**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of CRIMINAL USURY IN THE SECOND DEGREE in violation of Penal Law § 190.40 as follows:

The defendants, from on or about November 3, 2022 through January 14, 2024, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 9
(Related to Witness 2)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **FREDERICK P. FALCONE, SR.** and **FREDERICK FALCONE, JR.**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **ATTEMPTED CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 110.00/190.42 as follows:

The defendants, from on or about September 14, 2022 through November 3, 2022, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly attempted to charge, take, or receive money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 10
(Related to Victim 2)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 190.42 as follows:

The defendants, from on or about June 1, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 11
(Related to Victim 2)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE SECOND DEGREE** in violation of Penal Law § 190.40 as follows:

The defendants, from on or about June 1, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 12
(Related to Victim 3)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, FREDERICK P. FALCONE, SR.,** and **FREDERICK FALCONE, JR.,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 190.42 as follows:

The defendants, from on or about January 17, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 13
(Related to Victim 3)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, FREDERICK P. FALCONE, SR., and FREDERICK FALCONE, JR.,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE SECOND DEGREE** in violation of Penal Law § 190.40 as follows:

The defendants, from on or about January 17, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 14
(Related to Victim 4)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 190.42 as follows:

The defendants, from on or about December 4, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 15
(Related to Victim 4)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN,** and **JAMES MIRANDA,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE SECOND DEGREE** in violation of Penal Law § 190.40 as follows:

The defendants, from on or about December 4, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 16
(Related to Victim 5¹⁰)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE,** and **AMY L. MCLAUGHLIN,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 190.42 as follows:

The defendants, from on or about March 15, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 17
(Related to Victim 5)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE,** and **AMY L. MCLAUGHLIN,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of

¹⁰ Victim 5 is known to the members of the Grand Jury.

CRIMINAL USURY IN THE SECOND DEGREE in violation of Penal Law § 190.40 as follows:

The defendants, from on or about March 15, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 18
(Related to Victim 6¹¹)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE,** and **AMY L. MCLAUGHLIN,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendants, from on or about December 16, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of

¹¹ Victim 6 is known to the members of the Grand Jury.

any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 19
(Related to Victim 6)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE,** and **AMY L. MCLAUGHLIN,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE SECOND DEGREE** in violation of Penal Law § 190.40 as follows:

The defendants, from on or about December 16, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 20
(Related to Victim 7)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN,** and **JAMES MIRANDA,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury,

of the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendants, from on or about October 10, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 21
(Related to Victim 7)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of CRIMINAL USURY IN THE SECOND DEGREE in violation of Penal Law § 190.40 as follows:

The defendants, from on or about October 10, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 22
(Related to Victim 8¹²)

The Grand Jury of Richmond County, by this Indictment, accuses the defendant, **FREDERICK P. FALCONE, SR.**, of the crime of CRIMINAL USURY IN THE FIRST DEGREE in violation of Penal Law § 190.42 as follows:

The defendant, from on or about October 3, 2021 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 23
(Related to Victim 8)

The Grand Jury of Richmond County, by this Indictment, accuses the defendant, **FREDERICK P. FALCONE, SR.**, of the crime of CRIMINAL USURY IN THE SECOND DEGREE in violation of Penal Law § 190.40 as follows:

The defendant, from on or about October 3, 2021 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

¹² Victim 8 is known to the members of the Grand Jury.

COUNT 24
(Related to Victim 9)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 190.42 as follows:

The defendants, from on or about October 31, 2021 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 25
(Related to Victim 9)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE SECOND DEGREE** in violation of Penal Law § 190.40 as follows:

The defendants, from on or about October 31, 2021 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 26
(Related to Victim 10)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and FREDERICK P. FALCONE, SR.**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 190.42 as follows:

The defendants, from on or about January 10, 2023 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, as part of a scheme or business of making or collecting usurious loans, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 27
(Related to Victim 10)

The Grand Jury of Richmond County, by this Indictment, accuses the defendants **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and FREDERICK P. FALCONE, SR.**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **CRIMINAL USURY IN THE SECOND DEGREE** in violation of Penal Law § 190.40 as follows:

The defendants, from on or about January 10, 2023 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, each aiding the other and acting in concert, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 28
(Related to Victim 11¹³)

The Grand Jury of Richmond County, by this Indictment, accuses the defendant, **FREDERICK P. FALCONE, SR.**, of the crime of **CRIMINAL USURY IN THE FIRST DEGREE** in violation of Penal Law § 190.42 as follows:

The defendant, from on or about May 5, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, as part of a scheme or business of making or collecting usurious loans, while not being

¹³ Victim 11 is known to the members of the Grand Jury.

authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 29
(Related to Victim 11)

The Grand Jury of Richmond County, by this Indictment, accuses the defendant, **FREDERICK P. FALCONE, SR.**, of the crime of CRIMINAL USURY IN THE SECOND DEGREE in violation of Penal Law § 190.40 as follows:

The defendant, from on or about May 5, 2022 through May 9, 2023, in the County of Richmond and elsewhere, inside and outside the State of New York, while not being authorized or permitted to do so by law, knowingly charged, took, or received money, as interest on a loan or forbearance of any money, at a rate exceeding twenty-five per centum per annum or the equivalent rate for a longer or shorter period.

COUNT 30

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, ROBERT W. CARTER, ARTHUR GELLER, FREDERICK P. FALCONE, SR., FREDERICK FALCONE, JR., CHARLES FUSCO, JOHN MATERA, DANIEL H. SHAH, GIULIO POMPONIO, DANIEL F. BOGAN, VINCENT J. RICCIARDI, LOUIS A. PALOMBO, DANIEL M. SCARABAGGIO, and JAMES MIRANDA**, each aiding and acting in concert with each other and others known and unknown to the Grand

Jury, of the crime of CONSPIRACY IN THE FIFTH DEGREE in violation of Penal Law §105.05(1), as follows:

The defendants, from on or about April 14, 2022 to May 23, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, with intent that conduct constituting a felony be performed, to wit: PROMOTING GAMBLING IN THE FIRST DEGREE (Penal Law § 225.10(1)), agreed with one or more persons to engage in or cause the performance of such conduct.

PREAMBLE

It was the purpose of this conspiracy to operate an illegal gambling operation in which the participants oversaw, procured, offered, solicited, delivered, recorded, and contributed to any other phase of the illegal gambling operation.

It was the role of **EDWARD A. LAFORTE** as Master Agent to manage sheetholders, bettors, payment and the use of the online platform ubet1288.com. It was the role of **AMY L. MCLAUGHLIN** to assist **EDWARD A. LAFORTE** in maintaining, organizing, and keeping records, as well as collecting and distributing proceeds of the illegal gambling activities.

It was the role of **JOHN J. LAFORTE** to operate and act in a supervisory role over **EDWARD A. LAFORTE**'s Master Agent gambling account. It was the role of **JOHN J. LAFORTE** and **ANTHONY J. CINQUE, JR.** to fund a portion of the illegal gambling activities to assist with the payment of winning bettors.

It was the roles of **CHARLES FUSCO, ROBERT W. CARTER, GIULIO POMPONIO, ARTHUR GELLER, DANIEL M. SCARABAGGIO, DANIEL H.**

SHAH, VINCENT J. RICCIARDI, FREDERICK P. FALCONE SR., FREDERICK FALCONE, JR., LOUIS A. PALOMBO, and DANIEL F. BOGAN to operate as sheetholders under **EDWARD A. LAFORTE**'s Master Agent account. It was the role of the sheetholders to collect each bettor's financial losses and provided payment to the bettors if they won. The weekly figure was provided to their respective sheetholder by **EDWARD A. LAFORTE**, and many times with the assistance of **AMY L. MCLAUGHLIN**. It was the role of **JAMES MIRANDA** to act as a courier, collecting and distributing proceeds of the illegal gambling activities.

It was the role of **JOHN MATERA** to review weekly winnings and losses within the illegal gambling activities and review weekly bettor credit limits with other co-conspirators.

It was also a part of this conspiracy for members of the conspiracy to communicate with each other and others over cellular telephones using codes and communicate in a guarded, cryptic manner.

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. On or about June 15, 2022, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, "I need to borrow a couple of dollars till the end of the week. Fifteen hundred, if you have it" and **JOHN J. LAFORTE** replied, in sum and substance, "Yeah, you'd, yeah, how'd you do last

week. Good, no” whereupon **EDWARD A. LAFORTE** stated, in sum and substance, “Yeah, I did, but I carried some stuff, and then I’ll explain to you.”

2. On or about July 19, 2022, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **JOHN J. LAFORTE** stated, in sum and substance, “Who’s the offender? Shorty?” and “Yeah. Seems like he’s always the offender” and **EDWARD A. LAFORTE** replied, in sum and substance, “No but he wasn’t, Johnny, my main man. You know, I don’t know. Just the way it is, but we’ll see.”

3. On or about July 19, 2022, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **JOHN J. LAFORTE** stated, in sum and substance, “Yeah exact. It’s just different ways ones with a P and ones with a R” whereupon in the conversation **EDWARD A. LAFORTE** replied, in sum and substance, “But it’s allowed” and **JOHN J. LAFORTE** replied, in sum and substance, “No, it’s allowed by who, not by you, if you don’t allow it. I would not allow it[.]”

4. On or about August 5, 2022, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **JOHN J. LAFORTE** stated, in sum and substance, “Cut that whole thing right in half” and “All that deli meat, cut it right in half, all right?” and **EDWARD A. LAFORTE** responded, in sum and substance, “All right, bye. Yup.”

5. On or about August 16, 2022, in Richmond County, New York, **JOHN J. LAFORTE** had a telephone conversation with **JOHN MATERA**, during which, **JOHN J. LAFORTE** stated, in sum and substance, “Today, I went to, I had to go by Anthony’s take care of that. A miserable. A miserable week” and **JOHN MATERA** replied, in sum and substance, “It wasn’t, it could have been a lot worse.”

6. On or about July 17, 2022, in Richmond County, New York, **EDWARD A. LAFORTE** had a telephone conversation with **AMY L. MCLAUGHLIN**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Do you remember off hand Anthony’s number? How much I have to give him” and **AMY L. MCLAUGHLIN** replied, in sum and substance, “Twenty-three eighty without sports.”

7. On August 15, 2022, in Richmond County, New York, **ANTHONY J. CINQUE, JR.** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “No, no I got that straightened. I spoke to John” and **ANTHONY J. CINQUE, JR.** replied, in sum and substance, “All right, yeah. No big deal. I was just letting you know.”

8. On or about April 18, 2023, in Richmond County, New York, **ANTHONY J. CINQUE, JR.** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **ANTHONY J. CINQUE, JR.** stated, in sum and substance, “All right, I’m coming in.”

9. On or about April 18, 2023, in Richmond County, New York, **ANTHONY J. CINQUE, JR.** met with **EDWARD A. LAFORTE** at China Chalet, 4326 Amboy Road, Staten Island, New York.

10. On or about April 18, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** had a telephone conversation with **AMY L. MCLAUGHLIN**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Yeah, but meanwhile Anthony, the Anthony I didn’t know that he was going to come so quick, he came here I didn’t have the money, I didn’t have the envelope. I didn’t have nothing. I looked like a fucking imbecile.”

11. On or about August 15, 2022, in Richmond County, New York, **JOHN MATERA** had a telephone conversation with **JOHN J. LAFORTE**, during which, **JOHN J. LAFORTE** stated, in sum and substance, “Turned out, it turned out, where we got a little bit, a little lucky” and **JOHN MATERA** responded, in sum and substance, “Yeah, I know. Thank God. Of course, the few that were, that were heavy favorites. What was the last game? Um, the Yankees, right?” and “Yeah, there was one, I think it was the last game, kind of helps everywhere around the board. I know. What are you gonna do? You gotta give them, you know, throw them a bone every once in a while and hopefully they throw us bones a lot.”

12. On or about December 10, 2022, in Richmond County, New York, **JOHN MATERA** had a telephone conversation with **JOHN J. LAFORTE**, during which, **JOHN MATERA** stated, in sum and substance, “Hey, fucking over there to the

moon” and “I’m just saying every time I look, it’s worse” and **JOHN J. LAFORTE** responded, in sum and substance, “Well, whatever.”

13. On or about December 10, 2022, in Richmond County, New York, **JOHN MATERA** drove to and met with **EDWARD A. LAFORTE** inside of China Chalet, 4326 Amboy Road, Staten Island, New York.

14. On or about December 10, 2022, in Richmond County, New York, **JOHN MATERA**, **JOHN J. LAFORTE**, and **EDWARD A. LAFORTE** had a telephone conversation, during which, **JOHN J. LAFORTE** stated, in sum and substance, “Make sure that he, that he, that he stops at that, just above that even number. You understand what I’m saying?” and **EDWARD A. LAFORTE** replied, in sum and substance, “I gotcha, the higher, all right.” Later in that telephone conversation, **JOHN J. LAFORTE** stated, in sum and substance, “No, I’m calling my brother to make sure that that, that fella has, you know, you know what I’m talking about to the moon has the limit, you know what I mean?” and **JOHN MATERA** replied, in sum and substance, “Oh, yeah. What is it—” and **JOHN J. LAFORTE** replied, in sum and substance, “yeah, so...yeah, it’s—he’s there almost.”

15. On or about January 6, 2023, in Richmond County, New York, **JOHN MATERA**, **JOHN J. LAFORTE**, **EDWARD A. LAFORTE**, and **FREDERICK P. FALCONE, SR.**, met in the vicinity of Country Donuts, located at 4357 Amboy Road, Staten Island, New York, and collectively reviewed a book, which was taken out of **EDWARD A. LAFORTE**’s black bag.

16. On or about September 26, 2022, in Richmond County, New York, **GIULIO POMPONIO** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Did we, did we have an old player called park?” and **GIULIO POMPONIO** replied, in sum and substance, “Yeah.” Additionally, during the conversation, **GIULIO POMPONIO** stated, in sum and substance, “That’s actually—I’ll be honest with you, that’s the other guy, he need a, he call me yesterday for a little room, and I gave him that one, so it’s the same guy, it’s the same, same as that other guy” and **EDWARD A. LAFORTE** stated, in sum and substance, “Oh, he’s CUZ, he’s CUZ, so CUZ is park.”

17. On or about October 1, 2022, in Richmond County, New York, **GIULIO POMPONIO** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **GIULIO POMPONIO** stated, in sum and substance, “Nah, I just don’t want this fucking kid because it’s, it’s fifty-three and it’s already four next week. I don’t want him to get ahead of himself, you know what I mean, you know what I mean, I know it’s half and half, but I just don’t want this kid, fucking, you know, making a mess.”

18. On or about November 25, 2022, in Richmond County, New York, **GIULIO POMPONIO** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **GIULIO POMPONIO** stated, in sum and substance, “All right, and just put two on there for him cause he did give me something so that’s not too bad—” and **EDWARD A. LAFORTE** replied, in sum and substance, “Did you take bets like, did you, did you take action” and **GIULIO POMPONIO** replied, in sum and substance,

“—he won—yeah, yeah, all day long. Yeah, he drove me fucking nuts. He won two hundred dollars. So, no big deal. It’s a washout.”

19. On or about February 3, 2023, in Richmond County, New York, **GIULIO POMPONIO** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **GIULIO POMPONIO** stated, in sum and substance, “Yeah, so, he called me. He got, he got the check, but they took taxes. It’s like, it’s an annuity check for \$7,600” and **EDWARD A. LAFORTE** replied, in sum and substance, “Yeah” and **GIULIO POMPONIO** stated in sum and substance, “Four. He wants to give four. Four out of seventy-six.”

20. On or about February 11, 2023, in Richmond County, New York, **GIULIO POMPONIO** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Did you get that check clear?” and **GIULIO POMPONIO** replied, in sum and substance, “Yeah, it’s all done, you know. I got the—I had the money for you yesterday.”

21. On or about February 11, 2023, in Richmond County, New York, **GIULIO POMPONIO** delivered a check to **EDWARD A. LAFORTE** at 25 Walnut Avenue, Staten Island, New York.

22. On or about July 6, 2022, in Richmond County, New York, **CHARLES FUSCO** had a conversation with **EDWARD A. LAFORTE**, during which, **CHARLES FUSCO** stated, in sum and substance, “Add a thousand to Short” and **EDWARD A. LAFORTE** replied, in sum and substance, “Short, yes.”

23. On or about July 23, 2022, in Richmond County, New York, **CHARLES FUSCO** had a conversation with **EDWARD A. LAFORTE**, during which **CHARLES FUSCO** stated, in sum and substance, “I already gave him five, so he’s only owed 21. If I had to go and see him with something, you know—” and “As of right now, we’re, you know, we’re, we’re somewhat all right. I’d like to give him the 21 by the end of today” and **EDWARD A. LAFORTE** replied, in sum and substance, “Yes, I’m gonna give you—when—I’m gonna give you—let me give you thirty-one, let me give you—I can give you 3,000 or thirty-five.”

24. On or about August 21, 2022, in Richmond County, New York, **CHARLES FUSCO** had a conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE**, stated in sum and substance, “Yeah, but listen, could you do me. What’s our? Our balance is fifteen, right?” and whereupon in the conversation **CHARLES FUSCO** replied, in sum and substance, “I’ll give him the fifteen hundred,” referring to **JAMES MIRANDA**.

25. On or about August 21, 2022, in Richmond County, New York, **CHARLES FUSCO** met with **JAMES MIRANDA** inside of China Chalet, 4326 Amboy Road, Staten Island, New York.

26. On or about September 26, 2022, in Richmond County, New York, **EDWARD A. LAFORTE** had a telephone conversation with **CHARLES FUSCO**, during which, **EDWARD A. LAFORTE**, stated in sum and substance, “park is not yours?” and **CHARLES FUSCO** replied, “99.9 percent I’m right. The only thing we had was pizza.

Pizza went to tooth. Pizza was this jerk off Mike and I took him off. But Park, we had snow, heat, tooth, pizza, tall, no short, and I don't know if I had a tall."

27. On or about January 10, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** had a conversation with **AMY L. MCLAUGHLIN**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, "Charlie is gonna be here in about 20 minutes. Are you gonna be here with his number?" and **AMY L. MCLAUGHLIN** replied, in sum and substance, "Yeah, I started to do his work in the book. You have the two books."

28. On or about September 26, 2022, in Richmond County, New York, **ROBERT W. CARTER** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, "One of your, one of your guys is park, right?" and **ROBERT W. CARTER** replied in sum and substance, "No, park. Radio, plumber, china, pipe. That's it, four."

29. On or about November 2, 2022, in Richmond County, New York, **AMY L. MCLAUGHLIN** had a telephone conversation with **JAMES MIRANDA**, during which, **AMY L. MCLAUGHLIN** stated, in sum and substance, "I need you to count out two thousand and bring it to Eddie at China Chalet" and **JAMES MIRANDA** replied, in sum and substance, "Okay."

30. On or about November 2, 2022, in Richmond County, New York, **AMY L. MCLAUGHLIN** had a telephone conversation with **EDWARD A. LAFORTE**, during which **AMY L. MCLAUGHLIN** stated, in sum and substance, "Oh, Jimmy

was coming here. Want me to call him back and tell him not to come here?” during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Yeah, tell him not to come. Tell him where it is. Rob needs fifteen hundred and Rob wants to look at the plants anyway, all right?”

31. On or about November 2, 2022, in Richmond County, New York, **AMY L. MCLAUGHLIN** had a telephone conversation with **JAMES MIRANDA**, during which **AMY L. MCLAUGHLIN** stated, in sum and substance, “Okay, just count out fifteen hundred, okay? I know. I’m driving you crazy and Rob is gonna come there” and **JAMES MIRANDA** replied, in sum and substance, “All right, let me just, just cause I took it with, with hundreds.”

32. On or about November 2, 2022, in Richmond County, New York, **ROBERT W. CARTER** met with **JAMES MIRANDA** at 25 Walnut Avenue, Staten Island, New York.

33. On or about February 7, 2023, in Richmond County, New York, **ROBERT W. CARTER** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Well, in reality, in reality, in reality, well, you know, fifty sheet is like we are partners, so he is your guy you know how it is. So, that’s your call, whatever you want to do, I’ll do” during which, **ROBERT W. CARTER** replied, in sum and substance, “I trust him. But I just, I don’t know if he has enough money to cover, you know, I did his numbers. I see what he lost. This fucking guy lost like over twenty grand these past six weeks.”

34. On or about April 23, 2023, in Richmond County, New York, **ROBERT W. CARTER** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Cause you know what, with, with my partners, like, in other words, they look at the wins and lost and they only give me enough money, like assuming I’m going to collect from the losers so, say the winners—say they are above me like, a thousand dollar, cause I have to collect three, they are only going to give me a thousand—expecting that I am going to collect from the losers and then, I’m, you know, am running around trying to get money. I gotta pay the winners. I always pay the winners” during which, **ROBERT W. CARTER** replied, in sum and substance, “Yeah, yeah, this kid gotta pay me. It’ll be fucking five grand. I need my money badly.”

35. On or about June 12, 2022, in Richmond County, New York, **CHARLES FUSCO** had a telephone conversation with **LOUIS A. PALOMBO**, during which, **LOUIS A. PALOMBO** stated, in sum and substance, “Yeah, right, people, people bet the USFL?” and **CHARLES FUSCO** replied, in sum and substance, “That gave me one bet for that so I’m doing good right now but yesterday I got my ass kicked and during the week I got banged out a little.”


36. On or about March 20, 2023, in Richmond County, New York, **LOUIS A. PALOMBO** had a telephone conversation with **EDWARD A. LAFORTE**, during which **EDWARD A. LAFORTE** stated, in sum and substance, “Do me a favor cause I gotta go see our friend and I—just tell me what the number is. Then I’ll lay it, I’ll lay it out” and **LOUIS A. PALOMBO** replied, in sum and substance, “Seven-o-eight.”

37. On or about March 20, 2023, in Richmond County, New York, **LOUIS A. PALOMBO** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Okay, so what’s the, what’s the real number? For twenty-five what?” and **LOUIS A. PALOMBO** replied, in sum and substance, “What do you mean the total that they lost?”

38. On or about March 20, 2023, in Richmond County, New York, **LOUIS A. PALOMBO** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **LOUIS A. PALOMBO** stated, in sum and substance, “Bro, you, you shorted me two hundred” and “Yeah, it was supposed to be eleven-o-seven. You gave me nine-o, nine-o-seven” and **EDWARD A. LAFORTE** replied, in sum and substance, “Oh, maybe I gave you the wrong, all right. All right, I’ll, I’ll catch up to ya in a little while.”

39. On or about September 17, 2022, in Richmond County, New York, **VINCENT J. RICCIARDI** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “But, why don’t you, why don’t you put out your feelers out? We’ll do something, all right?” and **VINCENT J. RICCIARDI** replied, in sum and substance, “I mean I got one guy who won small.”

40. On or about December 1, 2022, in Richmond County, New York, **VINCENT J. RICCIARDI** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “—with the, with the two numbers, comes to nine fifty-five minus fifteen percent is eight what?” and “Eight twelve” and **VINCENT J. RICCIARDI** replied, in sum and substance, “It will be there—tomorrow.”

41. On or about December 2, 2022, in Richmond County, New York, **VINCENT J. RICCIARDI** sent an SMS message to **EDWARD A. LAFORTE**, that read in sum and substance, “812  DONE[.]”

42. On or about February 12, 2023, in Richmond County, New York, **VINCENT J. RICCIARDI** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **VINCENT J. RICCIARDI** stated, in sum and substance, “The limits, can the limits go up a little—” and **EDWARD A. LAFORTE** replied, in sum and substance, “I don’t raise limits when they’re winning” and **VINCENT J. RICCIARDI** replied in sum and substance, “—they want just 750. It’s really, it’s no big deal. It’s no problem.”

43. On or about November 12, 2022, in Richmond County, New York, **DANIEL F. BOGAN** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Yeah, I just stopped over for a slice a pizza, just to say hello” and **DANIEL F. BOGAN** replied, in sum and substance, “All right, okay, yeah, yeah, I got you here. Okay.”

44. On or about January 9, 2023, in Richmond County, New York, **DANIEL F. BOGAN** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **DANIEL F. BOGAN** informed **EDWARD A. LAFORTE**, in sum and substance, that he was going to his house.

45. On or about January 9, 2023, in Richmond County, New York, **DANIEL F. BOGAN** drove to and met **EDWARD A. LAFORTE** at 25 Walnut Avenue, Staten Island, New York.

46. While inside, on or about January 9, 2023, in Richmond County, New York, **EDWARD A. LAFORTE** had a telephone conversation with a customer service representative associated with ubet1288.com. Upon conclusion of the call, **DANIEL F. BOGAN** exited 25 Walnut Avenue, Staten Island, New York.

47. On or about September 26, 2022, in Richmond County, New York, **DANIEL M. SCARABAGGIO**, received an MMS message from **EDWARD A. LAFORTE**, that contained information for a sub-agent account with three player accounts to be utilized with ubet1288.com.

48. On or about October 11, 2022, in Richmond County, New York, **DANIEL M. SCARABAGGIO** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **DANIEL M. SCARABAGGIO** stated, in sum and substance, “He’s gonna... he says he’s gonna change it. They can’t do that no more. Straight games” and “I’m just looking to make everybody earn somehow—” and **EDWARD A. LAFORTE** replied, in sum and substance, “They can bet, they can bet the, they can do anything else. They can’t bet the fights anymore.”

49. On or about October 16, 2022, in Richmond County, New York, **DANIEL M. SCARABAGGIO** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “We’ve been here for three fucking generations, he can’t, he, I, how desperate could you be to attack us?” and **DANIEL M. SCARABAGGIO** replied, in sum and substance, “It’s not even that. Even me, it’s his brother” and “We always, we always did everything always, you know that. Ah you guys are good with me.”

50. On or about October 1, 2021, in Richmond County, New York, **FREDERICK P. FALCONE, SR., EDWARD A. LAFORTE,** and **AMY L. MCLAUGHLIN** met with Witness 1 to issue, discuss, and provide gambling credentials to ubet1288.com.

51. On or about February 24, 2022, in Richmond County, New York, **FREDERICK P. FALCONE, SR.** and **EDWARD A. LAFORTE** met with Witness 1 and Witness 2 to issue, discuss, and provide gambling credentials to ubet1288.com.

52. On or about June 29, 2022, in Richmond County, New York, **FREDERICK P. FALCONE, SR.,** had a telephone conversation with **EDWARD A. LAFORTE,** during which, **EDWARD A. LAFORTE** stated, in sum and substance, “Did you see that kid juice yet?” and “Sometimes you eat the bear, sometimes the bear eats you” and **FREDERICK P. FALCONE, SR.,** stated, in sum and substance, “He fucking ate us. I think he must be losing because he said, I’ll probably be giving it back to you next week.”

53. On or about September 20, 2022, in Richmond County, New York, **FREDERICK P. FALCONE, SR.,** had a telephone conversation with **EDWARD A. LAFORTE,** during which, **EDWARD A. LAFORTE,** stated, in sum and substance, “This...Juice” and “Up twenty-two hundred” and **FREDERICK P. FALCONE, SR.,** replied, “Really?”

54. On or about January 27, 2023, in Richmond County, New York, **FREDERICK P. FALCONE, SR.,** had a telephone conversation with **EDWARD A. LAFORTE,** during which, **FREDERICK P. FALCONE, SR.** stated, in sum and substance, “Oh,

his name is Juice, but it said shark over there. It said he owed a thousand, but it's not him" whereupon, **EDWARD A. LAFORTE** replied, in sum and substance, "I can call, I can, yeah, I, I can research this. But I mean, you—I mean Juice is Juice, usually that's what it is, but—"

55. On or about October 26, 2022, in Richmond County, New York, **FREDERICK FALCONE, JR.**, had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, "Did you talk to him about Juice?" and **FREDERICK FALCONE, JR.** replied, in sum and substance, "Yes, yes" and "There's two of them."

56. On or about November 2, 2022, in Richmond County, New York, **FREDERICK FALCONE, JR.**, had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, "Just tell him Donut...I'll see you Friday" and "He might want to know that before, you know Donut, five-fifty" and **FREDERICK FALCONE, JR.** replied, in sum and substance, "No problem. I, I, I always have with me anyway."

57. On or about November 3, 2022, in Richmond County, New York, **FREDERICK FALCONE, JR.**, met with Witness 1, and collected \$1,250 in gambling winnings from wagers placed on ubet1288.com.

58. On or about November 12, 2022, in Richmond County, New York, **FREDERICK FALCONE, JR.** had a telephone conversation with **EDWARD A.**

LAFORTE, whereupon they agreed to meet at China Chalet, 4326 Amboy Road, Staten Island, New York.

59. On or about November 12, 2022, in Richmond County, New York, **FREDERICK FALCONE, Jr.** met with **EDWARD A. LAFORTE** at China Chalet, 4326 Amboy Road, Staten Island, New York.

60. On or about August 19, 2022, in Richmond County, New York, **EDWARD A. LAFORTE** sent an MMS message to **DANIEL H. SHAH**, which contained a photograph of a document which stated, in sum and substance, “USR Name: shark428” “pw: house” “ubet1288.com” “1-877-820-4678”.

61. On or about September 20, 2022, in Richmond County, New York, **EDWARD A. LAFORTE** sent an MMS message to **DANIEL H. SHAH** which contained a photograph of a list of financial figures for the date range of September 5, 2022 to September 19, 2022, which read at the bottom of the document, in sum and substance, “-13,889[.]”

62. On or about September 24, 2022, in Richmond County, New York, **DANIEL H. SHAH** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **DANIEL H. SHAH** stated, in sum and substance, “I got to check what I have. I’ve got like fifteen, sixteen hundred on me” whereupon **EDWARD A. LAFORTE** stated, in sum and substance, “I’m talking about three weeks Daniel. It’s up there about sixteen or seventeen already” and “I’m paying for this shit at least fifty percent of it. You get twenty and I make a few dollars, but I have to pay the other people.”

63. On or about July 5, 2022, in Richmond County, New York, **ARTHUR GELLER** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **ARTHUR GELLER** stated, in sum and substance, “I was, I was hoping maybe, I don’t know, maybe your brother might come up with something, you know, a decent sized guy, and, and throw this guy in there and take a piece of him, you know. You know. I mean if you could come up with something like that” during which **EDWARD A. LAFORTE** replied, in sum and substance, “I could.” During the same telephone conversation, **EDWARD A. LAFORTE** stated, in sum and substance, “Should I, should I just cut my losses with this guy? Should I just tell him listen, I can’t do horses no more? I want to tell him I can’t do horses no more, right? I, I only got him. He’s my only horse player.”

64. On or about July 5, 2022, in Richmond County, New York, **ARTHUR GELLER** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “I would love for his to stay with me, you know. He has to understand I can’t get beat up like this no more” and **ARTHUR GELLER** replied, in sum and substance, “Nah, you don’t, you got the volume, you don’t got no other horse player. I get it.”

65. On or about July 5, 2022, in Richmond County, New York, **ARTHUR GELLER** had a telephone conversation with **EDWARD A. LAFORTE**, during which, **EDWARD A. LAFORTE** stated, in sum and substance, “He, I, I called the office. He took me for over thirty-five thousand in this” and **ARTHUR GELLER**

replied, in sum and substance, “Jesus Christ, I heard this kid fucking won ninety thousand Friday.”

66. On or about July 5, 2022, in Richmond County, New York, **EDWARD A. LAFORTE** and **ARTHUR GELLER** met in the vicinity of China Chalet, 4326 Amboy Road, Staten Island, New York.

COUNT 31

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE**, **ANTHONY J. CINQUE, JR.**, **EDWARD A. LAFORTE**, **AMY L. MCLAUGHLIN**, and **JOHN MATERA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about August 27, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 32

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE**, **ANTHONY J. CINQUE, JR.**, **EDWARD A. LAFORTE**, **AMY L. MCLAUGHLIN**, and **JOHN MATERA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the

crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about September 24, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 33

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JOHN MATERA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 22, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 34

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A.**

LAFORTE, AMY L. MCLAUGHLIN, and JOHN MATERA, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 4, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 35

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and JOHN MATERA**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 10, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 36

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and GIULIO POMPONIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about September 17, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 37

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and GIULIO POMPONIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 23, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 38

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and GIULIO POMPONIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about November 26, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 39

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and CHARLES FUSCO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about April 16, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 40

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and CHARLES FUSCO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about May 7, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 41

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and CHARLES FUSCO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury,

of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about June 5, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 42

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and CHARLES FUSCO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about July 16, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 43

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A.**

LAFORTE, AMY L. MCLAUGHLIN, and CHARLES FUSCO, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about September 25, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 44

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and CHARLES FUSCO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 23, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 45

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN,** and **CHARLES FUSCO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about November 12, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 46

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN,** and **CHARLES FUSCO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 30, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 47

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about April 14, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 48

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about July 16, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 49

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about August 18, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 50

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury,

of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about September 11, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 51

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 23, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 52

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A.**

LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about November 13, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 53

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 24, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 54

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about January 22, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 55

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about February 12, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 56

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL F. BOGAN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about March 4, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 57

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and ROBERT W. CARTER**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about April 24, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 58

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and ROBERT W. CARTER**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about May 10, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 59

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and ROBERT W. CARTER**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury,

of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about July 3, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 60

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and ROBERT W. CARTER**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about September 26, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 61

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A.**

LAFORTE, AMY L. MCLAUGHLIN, and ROBERT W. CARTER, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 23, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 62

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and ROBERT W. CARTER**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 6, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 63

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN,** and **ROBERT W. CARTER,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about January 16, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 64

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN,** and **ROBERT W. CARTER,** each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about February 28, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 65

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and LOUIS A. PALOMBO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about November 13, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 66

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and LOUIS A. PALOMBO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about November 20, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 67

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and LOUIS A. PALOMBO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 4, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 68

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and LOUIS A. PALOMBO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury,

of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 18, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 69

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and ARTHUR GELLER**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about May 27, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 70

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A.**

LAFORTE, AMY L. MCLAUGHLIN, and ARTHUR GELLER, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about June 4, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 71

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and ARTHUR GELLER**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about June 5, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 72

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL M. SCARABAGGIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 1, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 73

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL M. SCARABAGGIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 8, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 74

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL M. SCARABAGGIO**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about October 9, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 75

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL H. SHAH**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about August 19, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 76

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL H. SHAH**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about August 24, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 77

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL H. SHAH**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury,

of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about August 27, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 78

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and DANIEL H. SHAH**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of PROMOTING GAMBLING IN THE FIRST DEGREE in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about August 28, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 79

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A.**

LAFORTE, AMY L. MCLAUGHLIN, and DANIEL H. SHAH, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about September 1, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 80

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and VINCENT J. RICCIARDI**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about November 20, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 81

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and VINCENT J. RICCIARDI**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about December 31, 2022, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 82

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and VINCENT J. RICCIARDI**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about January 1, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 83

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **JOHN J. LAFORTE, ANTHONY J. CINQUE, JR., EDWARD A. LAFORTE, AMY L. MCLAUGHLIN, and VINCENT J. RICCIARDI**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **PROMOTING GAMBLING IN THE FIRST DEGREE** in violation of Penal Law § 225.10(1) as follows:

The defendants, on or about February 11, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly advanced or 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 84

The Grand Jury of Richmond County, by this Indictment, accuses the defendants, **EDWARD A. LAFORTE** and **AMY L. MCLAUGHLIN**, each aiding and acting in concert with each other and others known and unknown to the Grand Jury, of the crime of **POSSESSION OF GAMBLING RECORDS IN THE FIRST DEGREE** in violation of Penal Law § 225.20(1) as follows:

The defendants, on or about May 9, 2023, in the County of Richmond and elsewhere inside and outside the State of New York, knowingly possessed a writing, paper, instrument or article of a kind commonly used in the operation, promotion of bookmaking scheme or enterprise, and said writing, paper, instrument or article constituted, reflected or represented more than five bets totaling more than five thousand dollars.

Dated: May ____, 2024
Richmond County, New York

NICOLE KEARY
Deputy Attorney General
Organized Crime Task Force

By _____
JOSEPH MARCIANO, ESQ.
Assistant Deputy Attorney General
Organized Crime Task Force

A TRUE BILL

GRAND JURY FOREPERSON
Dated: May ____, 2024