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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA :  
 :  
 v. : CRIMINAL COMPLAINT  
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 : Mag. No. 04-3593 (MF)  
 ROBERT FIORELLO, :  
 a/k/a "Bobby Cars," :  
 JOSEPH FIORELLO, :  
 JONATHAN SORGE, :  
 CHARLES THOMPSON, :  
 ANTHONY LADUCA, :  
 JOSE PEREZ, :  
 a/k/a "Kubie," :  
 ROCCO PANZINO, :  
 CARMEN MARCHITELLO, :  
 NICHOLAS LABRUNO, :  
 VINCENT SPINA, :  
 ROBERT BOLLANDER, :  
 a/k/a "Joseph P. Servidio," :  
 a/k/a "Bobby Bumpers," :  
 RICHARD LEONARD, :  
 a/k/a "Buddy Carson," :  
 a/k/a "Fat Richie," :  
 RAYMOND CLARK, and :  
 JOSEPH LUCANIA :

I, Jason Bevan, being duly sworn, state the following is true and correct to the best of my knowledge and belief. Beginning as early as January 2001 and continuing through at least June 2003 in Essex, Bergen, Passaic, and Monmouth Counties, in the District of New Jersey, and elsewhere, defendants ROBERT FIORELLO, a/k/a "Bobby Cars," JOSEPH FIORELLO, JONATHAN SORGE, CHARLES THOMPSON, ANTHONY LADUCA, JOSE PEREZ, a/k/a "Kubie," ROCCO PANZINO, CARMEN MARCHITELLO, NICHOLAS LABRUNO, VINCENT SPINA, ROBERT BOLLANDER, a/k/a "Joseph P. Servidio," a/k/a "Bobby Bumpers," RICHARD LEONARD, a/k/a "Buddy Carson," a/k/a "Fat Richie," RAYMOND CLARK, and

JOSEPH LUCANIA did knowingly and willfully conspire and agree with each other and others to:

- (1) disconnect, reset, alter, and have disconnected, reset, or altered, odometers of motor vehicles intending to change the mileage registered by the odometers, contrary to Title 49, United States Code, Sections 32703(2) and 32709(b); and
- (2) transport in interstate commerce any falsely made, forged, altered, and counterfeited securities, knowing same to have been falsely made, forged, altered, and counterfeited, contrary to Title 18, United States Code, Section 2314,

See **ATTACHMENT B** for Overt Acts that are alleged and incorporated as if set forth at length herein.

In violation of Title 18, United States Code, Section 371.

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

See **ATTACHMENT A**.

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JASON BEVAN, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
on March 30, 2004, at Newark, New Jersey

HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

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Signature of Judicial Officer

## ATTACHMENT A

I, Jason Bevan, a Special Agent with the Federal Bureau of Investigation, having conducted an investigation and having spoken with other individuals, have knowledge of the following facts:

1. At all times relevant and material to this Complaint:
  - a. Defendant ROBERT FIORELLO, a/k/a “Bobby Cars,” was engaged in the business of buying and selling used motor vehicles using various business entities, including, but not limited to, Bloomingdale Motors, Caprice Auto Sales, Keystone Auto Sales, Semi Motors, JPF Auto Sales, RP Auto Sales, Tribute Auto Sales, and Michael J. Schiraldi, Inc., d/b/a, MJS (hereinafter “MJS”), at locations in New Jersey and elsewhere;
  - b. Defendant JOSEPH FIORELLO was engaged in the business of buying and selling used motor vehicles using various business entities, including, but not limited to, JPF Auto Sales, Semi Motors, Tribute Auto Sales, Bloomingdale Motors, and RP Auto Sales, at locations in New Jersey and elsewhere;
  - c. Defendant JONATHAN SORGE was engaged in the business of buying and selling used motor vehicles on behalf of various business entities, including, but not limited to, JPF Auto Sales, MJS, Semi Motors, Industrial Truck & Auto Sales and Bloomingdale Motors, at locations in New Jersey and elsewhere;
  - d. Defendant CHARLES THOMPSON was engaged in the business of buying and selling used motor vehicles on behalf of various business entities including, but not limited to, Schumatti Enterprises, Hooper Motors, Tribute Auto Sales, JPF Auto Sales, CMJ Auto Sales, and HOFs Auto Sales, at locations in New Jersey and elsewhere;
  - e. Defendant ANTHONY LADUCA was engaged in the business of buying and selling used motor vehicles on behalf of various business entities including, but not limited to, Industrial Truck & Auto Sales and Lease Release, at locations in New Jersey and elsewhere. LADUCA was also in the business of altering motor vehicle odometer statements and titles for a fee;

- f. Defendant JOSE PEREZ, a/k/a “Kubie,” was engaged in the business of buying and selling used motor vehicles on behalf of various business entities including, but not limited to, Industrial Truck & Auto Sales, Semi Motors, RP Auto Sales and Prime Leasing, at locations in New Jersey and elsewhere;
- g. Defendant ROCCO PANZINO was engaged in the business of buying and selling used motor vehicles on behalf of various business entities including, but not limited to, RP Auto Sales and Semi Motors, at locations in New Jersey and elsewhere;
- h. Defendant CARMEN MARCHITELLO was engaged in the business of buying and selling used motor vehicles on behalf of various business entities including, but not limited to, CMJ Auto Sales, Hooper Motors, and HOF S Auto Sales, at locations in New Jersey and elsewhere;
- i. Defendant NICHOLAS LABRUNO was engaged in the business of buying and selling used motor vehicles on behalf of various business entities including, but not limited to, Schumatti Enterprises, King of the Road and Manhattan Auto Sales, at locations in New Jersey and elsewhere;
- j. Defendant VINCENT SPINA was engaged in the business of buying and selling used motor vehicles on behalf of various business entities including, but not limited to, Schumatti Enterprises, King of the Road and Manhattan Auto Sales, at locations in New Jersey and elsewhere. SPINA was also in the business of altering motor vehicle odometer statements and titles for a fee;
- k. Defendant ROBERT BOLLANDER, a/k/a “Joseph P. Servidio,” a/k/a “Bobby Bumpers,” was engaged in the business of buying and selling used motor vehicles for various business entities including, but not limited to, JPF Auto Sales, Tribute Auto Sales, and MJS, at locations in New Jersey and elsewhere;
- l. Defendant RICHARD LEONARD, a/k/a “Buddy Carson,” a/k/a “Fat Richie,” was engaged in the business of buying and selling used motor vehicles on behalf of various business entities including, but not limited to, JPF Auto Sales, Semi Motors and RP Auto Sales, at various locations in New Jersey and elsewhere; and

- m. Defendant RAYMOND CLARK was engaged in the business of buying and selling used motor vehicles on behalf of various business entities, including, but not limited to, HOFS Auto Sales and CMJ Auto Sales, at locations in New Jersey and elsewhere.
- n. Defendant JOSEPH LUCANIA was engaged in the business of buying and selling used motor vehicles from and through various New Jersey business entities including, but not limited to, Semi Motors, RP Auto Sales, and Tribute Auto Sales, at locations on Long Island, New York, and elsewhere;

2. The investigation has determined through numerous sources that from at least in or about January 2001 through in or about June 2003, defendants ROBERT FIORELLO, a/k/a "Bobby Cars," JOSEPH FIORELLO, JONATHAN SORGE, CHARLES THOMPSON, ANTHONY LADUCA, JOSE PEREZ, a/k/a "Kubie," ROCCO PANZINO, CARMEN MARCHITELLO, NICHOLAS LABRUNO, VINCENT SPINA, ROBERT BOLLANDER, a/k/a "Joseph P. Servidio," a/k/a "Bobby Bumpers," RAYMOND CLARK, and their co-conspirators, purchased hundreds of used motor vehicles - primarily late-model, high-mileage vehicles - for the purpose of reselling the vehicles after their odometers had been rolled back. These vehicles were purchased from various sources, including, but not limited to, the Harrisburg Auto Auction in Mechanicsburg, Pennsylvania; the Danville Auto Auction in Danville, Pennsylvania; the Garden Spot Auto Auction in Ephrata, Pennsylvania; and the Bel Air Auto Auction in Bel Air, Maryland. The defendants purchased vehicles from these locations because these auctions, at the times in question, did not report the mileage on the vehicles which they were offering for sale to consumer databases such as CarFax or Auto Vin. Accordingly, these vehicles did not have a record by which those to whom the defendants resold the vehicles could verify their true mileage. Once the defendants had ascertained that there was no mileage history for the vehicle or that the last recorded mileage statement on record showed only a very low mileage number, the defendants would purchase the vehicle from the auction.

3. The investigation has also determined through numerous sources that defendants ROBERT FIORELLO, a/k/a "Bobby Cars," JOSEPH FIORELLO, JONATHAN SORGE, CHARLES THOMPSON, ANTHONY LADUCA, JOSE PEREZ, a/k/a "Kubie," ROCCO PANZINO, CARMEN MARCHITELLO, NICHOLAS LABRUNO, VINCENT SPINA, ROBERT BOLLANDER, a/k/a "Joseph P. Servidio," a/k/a "Bobby Bumpers," RICHARD LEONARD, a/k/a "Buddy Carson," a/k/a "Fat Richie," and RAYMOND CLARK and others took these vehicles or the vehicles' odometers, once purchased, to various locations in New Jersey and Brooklyn, New York

for the purpose of rolling back the vehicles' odometers. The odometers of these vehicles would typically be rolled back by 30,000 miles to as much as 100,000 miles.

4. Specifically, the investigation has determined that various defendants, including but not limited to, ROBERT FIORELLO, a/k/a "Bobby Cars," JOSEPH FIORELLO, JONATHAN SORGE, CHARLES THOMPSON, ANTHONY LADUCA, JOSE PEREZ, a/k/a "Kubie," ROCCO PANZINO, CARMEN MARCHITELLO, NICHOLAS LABRUNO, VINCENT SPINA, ROBERT BOLLANDER, a/k/a "Joseph P. Servidio," a/k/a "Bobby Bumpers," and RICHARD LEONARD, a/k/a "Buddy Carson," a/k/a "Fat Richie," took numerous digital odometer mechanisms from New Jersey to be rolled back at A&J Auto Lock and Glass in Brooklyn, New York, and that, during certain periods, these defendants would have from 10 to 20 odometers rolled back per week at this location.

5. In addition, the investigation has learned from numerous sources that various defendants, including, but not limited to, CHARLES THOMPSON, ANTHONY LADUCA, JOSE PEREZ, a/k/a "Kubie," CARMEN MARCHITELLO, NICHOLAS LABRUNO, VINCENT SPINA, RICHARD LEONARD, a/k/a "Buddy Carson," a/k/a "Fat Richie," and RAYMOND CLARK, brought numerous digital odometer mechanisms to Eastern Electronics in Hackensack, New Jersey to be rolled back. Defendants MARCHITELLO, CLARK and ROBERT FIORELLO, a/k/a "Bobby Cars," prepared fraudulent paperwork, including Odometer Disclosure statements, which they provided to Eastern Electronics, asserting that the odometers should be rolled back to reflect what MARCHITELLO, CLARK and FIORELLO falsely alleged were the true mileage figures of the vehicles.

6. The investigation has also learned from numerous sources that various defendants, including, but not limited to, ANTHONY LADUCA, JOSE PEREZ, a/k/a "Kubie," CARMEN MARCHITELLO, RICHARD LEONARD, a/k/a "Buddy Carson," a/k/a "Fat Richie," and RAYMOND CLARK engaged in the manual rollback of analogue odometers on the cars that the defendants had purchased. The defendants rolled back these analogue odometer mechanisms at their respective business locations, including, but not limited to, car lots located in New Jersey towns and cities such as Keansburg, Garfield, Bloomfield, Belleville, Newark and Bloomingdale.

7. The investigation has also determined from numerous sources that the conspirators relied upon defendants ANTHONY LADUCA and VINCENT SPINA to alter the motor vehicle title for each of the vehicles for which the odometer had been rolled back. Defendants ANTHONY LADUCA and VINCENT SPINA would alter or forge the title so that its mileage figure would correspond to the odometer reading after

the roll back had been completed. Defendants LADUCA and SPINA would also alter the mileage figure on the Odometer Disclosure statement to correspond to the rolled back figure.

8. The investigation has also determined through several sources that defendant JOSEPH LUCANIA would travel to New Jersey to accept vehicles to sell on consignment from defendant ROBERT FIORELLO, a/k/a "Bobby Cars," knowing that the odometers on these vehicles had been rolled back. Defendant LUCANIA did not disclose that the odometers of these vehicles had been rolled back when he resold them.

9. The investigation has further determined that the defendants, including, but not limited to, ROBERT FIORELLO, a/k/a "Bobby Cars," JOSEPH FIORELLO, JONATHAN SORGE, CHARLES THOMPSON, ANTHONY LADUCA, JOSE PEREZ, a/k/a "Kubie," ROCCO PANZINO, CARMEN MARCHITELLO, NICHOLAS LABRUNO, VINCENT SPINA, ROBERT BOLLANDER, a/k/a "Joseph P. Servidio," a/k/a "Bobby Bumpers," RICHARD LEONARD, a/k/a "Buddy Carson," a/k/a "Fat Richie," and JOSEPH LUCANIA resold vehicles after their odometers had been rolled back without disclosing the true mileage of the vehicles. These vehicles were resold to numerous car dealerships throughout New Jersey and New York, and many vehicles were resold directly to individual consumers either through newspaper advertisements or from the car lots operated by the individual defendants. The failure to disclose the actual mileage of the vehicles whose odometers had been rolled back enabled the defendants to sell the vehicles for thousands of dollars more than they would have been able to realize had they disclosed the vehicles' true mileage to consumers.

## ATTACHMENT B

### OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the following overt acts were committed in the District of New Jersey and elsewhere:

1. In or about October 2001, defendant ROBERT FIORELLO, a/k/a “Bobby Cars,” sold to a third party in Staten Island, New York, a 2000 Buick Century, VIN 2G4WS52J6Y1176439, which had an odometer reading of approximately 20,296 miles at the time of the sale. This vehicle had previously been purchased, in or about September 2001, at an auto auction in Maryland, at which time it had an odometer reading of approximately 70,296, and thereafter this vehicle was transported to New Jersey. ROBERT FIORELLO knew at the time that he sold the vehicle in October 2001 that the odometer on the vehicle had been altered.

2. In or about August 2002, defendant JOSEPH FIORELLO obtained a dealer’s licence in New Jersey for “JPF Auto Sales.” JPF Auto Sales was registered in or about late December 2002 or early January 2003 at an auto auction in Maryland for the purpose, among other things, of purchasing late-model, high-mileage vehicles, the odometers of which would be rolled back before the vehicles were resold to third parties.

3. In or about February 2003, defendant JONATHAN SORGE sold to a third party in New Jersey a Ford F-250 truck, VIN 1FTPX28L8WNA54730, which had an odometer reading of approximately 51,000 at the time of the sale. This motor vehicle had been purchased in or about January 2003 at an auto auction in Tennessee, at which time it had an odometer reading of approximately 150,145 miles. JONATHAN SORGE knew at the time he sold the vehicle in February 2003 that the odometer on the vehicle had been altered.

4. In or about August 2002, defendant CHARLES THOMPSON sold to a third party in New Jersey a 2001 Chevrolet Impala, VIN 2G1WF55E219137855, which had an odometer reading of 17,083 miles at the time of the sale. This motor vehicle had been purchased in or about June 2002 from an auto auction in Pennsylvania, at which time it had an odometer reading of approximately 80,867 miles. CHARLES THOMPSON knew at the time he sold the vehicle in August 2002 that the odometer on the vehicle had been altered.

5. In or about September 2002, defendant ANTHONY LADUCA sold to a third party in New Jersey a 2000 Dodge Durango, VIN 1B4HS28N8YF224146, with an



odometer reading of approximately 26,423 miles at the time of the sale. This motor vehicle had been purchased in or about September 2002 at an auto auction in Pennsylvania, at which time it had an odometer reading of approximately 94,990 miles. ANTHONY LADUCA knew at the time that he sold the vehicle in September 2002 that the odometer on the vehicle had been altered.

6. In or about March 2003, defendant JOSE PEREZ, a/k/a "Kubie," sold to a third party in New Jersey a 2001 Chevrolet Impala, VIN 2G1WH55K919167547, with an odometer reading of approximately 22,826 miles at the time of the sale. This vehicle had been purchased in or about March 2003 at an auto auction in Pennsylvania, at which time it had an odometer reading of approximately 89,271 miles. JOSE PEREZ knew at the time that he sold the vehicle in March 2003 that the odometer on the vehicle had been altered.

7. In or about May 2001, defendant ROCCO PANZINO obtained a dealer's license in New Jersey for "RP Auto Sales." RP Auto Sales was registered in or about May 2001 at an auto auction in Maryland, for the purpose, among other things, of purchasing late-model, high-mileage vehicles, the odometers of which would be rolled back before the vehicles were resold to third parties.

8. In or about July 2002, defendant CARMEN MARCHITELLO sold to a third party in New Jersey a 1999 Dodge Caravan, VIN 2B4GP44G0XR394184, with an odometer reading of approximately 35,609 miles at the time of the sale. This vehicle had been purchased in or about June 2002 from an auto auction in Pennsylvania, at which time it had an odometer reading of approximately 95,609 miles. CARMEN MARCHITELLO knew at the time that he sold the vehicle in July 2002 that the odometer on the vehicle had been altered.

9. In or about May 2003, defendant NICHOLAS LABRUNO sold to a third party in New Jersey a 2000 Ford Expedition, VIN 1FMRU1669YLB36081, with an odometer reading of approximately 43,520 miles at the time of the sale. This vehicle had been purchased in or about March 2003 at a New Jersey car dealership, at which time it had an odometer reading of approximately 76,121 miles. NICHOLAS LABRUNO knew at the time that he sold the vehicle in May 2003 that the odometer on the vehicle had been altered.

10. In or about May 2002, defendant VINCENT SPINA caused the registration in New Jersey of a 2002 Oldsmobile Intrigue, VIN 1G3WS52H4YF192486, with an odometer reading of approximately 28,005 miles at the time of the sale. This vehicle had been purchased in or about May 2002 at an auto auction in Pennsylvania, at which time it

had an odometer reading of approximately 68,629 miles. VINCENT SPINA knew at the time that the vehicle was registered in May 2002 that the odometer on the vehicle had been altered.

11. In or about January 2003, defendant ROBERT BOLLANDER, a/k/a “Joseph P. Servidio,” a/k/a “Bobby Bumpers,” sold to a third party in New Jersey a 2000 Dodge Caravan, VIN 2B4GP45RXYS826894, with an odometer reading of approximately 28,241 miles at the time of the sale. This vehicle had been purchased in or about December 2002 at an auto auction in Pennsylvania, at which time it had an odometer reading of approximately 68,106 miles. ROBERT BOLLANDER knew at the time that he sold the vehicle in January 2003 that the odometer on the vehicle had been altered.

12. In or about May 2003, defendant RICHARD LEONARD, a/k/a “Buddy Carson,” a/k/a “Fat Richie,” sold to a third party in New Jersey a 1999 Ford Explorer, VIN 1FMZU34X6XUB58734, with an odometer reading of approximately 47,333 miles at the time of the sale. This vehicle had been purchased in or about May 2003 at an auto auction in Pennsylvania, at which time it had an odometer reading of approximately 137,096 miles. RICHARD LEONARD knew at the time that he sold the vehicle in May 2003 that the odometer on the vehicle had been altered.

13. On various dates throughout 2002, defendant RAYMOND CLARK personally removed or “pulled” the odometer mechanisms from certain motor vehicles and then took the clusters to a business in Bergen County, New Jersey, where the odometer mechanisms were rolled back to lower-mileage figures.

14. In or about October 2002, defendant JOSEPH LUCANIA sold to an undercover investigator in Long Island, New York, a 2000 Dodge Caravan, VIN 1B4GP45GXYB558023, with an odometer reading of approximately 34,050 miles at the time of the sale. This vehicle had been purchased in or about August 2002 at an auto auction in Pennsylvania, at which time it had an odometer reading of approximately 84,046 miles and thereafter was transported to New Jersey. JOSEPH LUCANIA knew at the time that he sold the vehicle in October 2002 that the odometer on the vehicle had been altered.