

Operation Shout



**Nicholas Furina, Hiring Agent
P&O Ports North America, Inc.**



**Ralph Esposito, Shop Steward
ILA Local #1588
Global Terminal**



**John Timpanaro, President
ILA Local #1588**



**Anthony DiErrico, Field Boss
ILA Local #1588
Global Terminal**



**Aniello Bello, Hiring Agent
Global Terminal**



**Nicholas Romano, Former Shop Steward
ILA Local #1588
Global Terminal**



**Carlo Bilancione, Former Field Boss
ILA Local #1588
Global Terminal**

**Racketeering (*N.J.S.A. 2C:41-1 et. seq.*)
Theft by Extortion (*N.J.S.A. 2C:20-5*)
Commercial Bribery (*N.J.S.A. 2C:21-10*)
Conspiracy (*N.J.S.A. 2C:41-2d*)**

NICHOLAS FURINA

Charge Number 1 (Racketeering) - did commit the crime of racketeering, that is, the defendant and other persons employed by and associated with an enterprise, that is, a group of individuals associated in fact and affiliated with the Genovese Organized Crime Family of “La Cosa Nostra”, engaged in and the activities of which affected trade or commerce, purposely and knowingly did conduct and participate, directly and indirectly, in the conduct of the enterprise’s affairs through a pattern of racketeering activity, including theft by extortion and commercial bribery, contrary to the provisions of N.J.S.A. 2C:41-2c;

Charge Number 2 (Theft by Extortion) -did purposefully and unlawfully obtain the property of others by extortion in that NICHOLAS FURINA did purposefully threaten to: cause officials to take or withhold action as an official and inflict other harm of no substantial benefit to himself calculated to materially harm other persons, that is NICHOLAS FURINA did, and did conspire with and aid others to extort money from the membership of the International Longshoreman’s Association Local 1588 by threatening to alter work schedules and withhold training and job assignments for those members who failed to pay, all contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6.

Charge Number 3 (Commercial Bribery) did knowingly solicit, accept or agree to accept, a benefit for knowingly violating or agreeing to violate a duty of fidelity to which he is subject as: an agent, partner or employee of another; an officer, director, manager or other participant in the direction of the affairs of an incorporated or unincorporated association; or a labor official, including any duly appointed representative of a labor organization or any duly appointed trustee or representative of an employee welfare trust fund, or did confer, or did offer or agree to confer any benefit the acceptance of which would be criminal under this section, that is NICHOLAS FURINA did, and did conspire with and aid officials of the International Longshoreman’s Association Local 1588 and management employees of Global Terminal to collect payments from the Local 1588 membership in return for prime job assignments, training for higher paying jobs and overtime assignments and did through those same officials and employees deny similar opportunities to members who did not pay, all contrary to the provisions of N.J.S.A. 2C:21-10 and N.J.S.A. 2C:2-6.

Charge Number 4 (Conspiracy) - did with other persons whose identities are both known and unknown to the Complainants, some of whom are named as coconspirators, with the purpose of promoting and facilitating the crimes of theft by extortion, commercial bribery and racketeering, agree that: a) one or more of them would engage in conduct which would constitute the aforesaid crimes, and b) one or more of them would aid in the planning, solicitation and commission of the aforesaid crimes, that is: theft by extortion as detailed in Charge Number 2, commercial bribery as detailed in Charge Number 3, and racketeering as detailed in Charge Number 1, all contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:41-2d;

Charge Number 5 (Leader of Organized Crime) - did commit the crime of leader of organized crime, in that the said NICHOLAS FURINA purposely did conspire with other persons whose identities are known and unknown to the Complainants, who comprised an illegal enterprise of individuals associated in fact and affiliated with the Genovese Organized Crime Family enterprise of "La Cosa Nostra", through his position as a "soldier" in that enterprise, as an organizer, supervisor and manager, to commit a continuing series of crimes which would constitute a pattern of racketeering activity, pursuant to the provisions of N.J.S.A. 2C:41-1, as detailed in Charge Number 1, contrary to the provisions of N.J.S.A. 2C:5-2g.

RALPH ESPOSITO

Charge Number 1 (Racketeering) - did commit the crime of racketeering, that is, the defendant and other persons employed by and associated with an enterprise, that is, a group of individuals associated in fact and affiliated with the Genovese Organized Crime Family of “La Cosa Nostra”, engaged in and the activities of which affected trade or commerce, purposely and knowingly did conduct and participate, directly and indirectly, in the conduct of the enterprise’s affairs through a pattern of racketeering activity, including theft by extortion and commercial bribery, contrary to the provisions of N.J.S.A. 2C:41-2c;

Charge Number 2 (Theft by Extortion) -did purposefully and unlawfully obtain the property of others by extortion in that RALPH ESPOSITO did purposely threaten to: cause officials to take or withhold action as an official; and inflict other harm of no substantial benefit to himself calculated to materially harm other persons; that is RALPH ESPOSITO did, and did conspire with and aid others to extort money from the membership of the International Longshoreman’s Association Local 1588 through his position as union shop steward at Global Terminal, by threatening to alter work schedules and withhold training and job assignments for those members who failed to pay, all contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6.

Charge Number 3 (Commercial Bribery) did knowingly solicit, accept or agree to accept, a benefit for knowingly violating or agreeing to violate a duty of fidelity to which he is subject as: an agent, partner or employee of another; an officer, director, manager or other participant in the direction of the affairs of an incorporated or unincorporated association; or a labor official, including any duly appointed representative of a labor organization or any duly appointed trustee or representative of an employee welfare trust fund, or did confer, or did offer or agree to confer any benefit the acceptance of which would be criminal under this section, that is RALPH ESPOSITO did, and did conspire with and aid others in his capacity as union shop steward of the International Longshoreman’s Association Local 1588 at Global Terminal to collect payments from the Local 1588 membership in return for prime job assignments, training for higher paying jobs and overtime assignments and did as the union shop steward deny similar opportunities to members who did not pay, all contrary to the provisions of N.J.S.A. 2C:21-10 and N.J.S.A. 2C:2-6.

Charge Number 4 (Conspiracy) - did with other persons whose identities are both known and unknown to the Complainants, some of whom are named as coconspirators, with the purpose of promoting and facilitating the crimes of theft by extortion, commercial bribery and racketeering, agree that: a) one or more of them would engage in conduct which would constitute the aforesaid crimes, and b) one or more of them would aid in the planning, solicitation and commission of the aforesaid crimes, that is: theft by extortion as detailed in Charge Number 2, commercial bribery as detailed in Charge Number 3, and racketeering as detailed in Charge Number 1, all contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:41-2d;

ANIELLO "SONNY" BELLO

Charge Number 1 (Racketeering) - did commit the crime of racketeering, that is, the defendant and other persons employed by and associated with an enterprise, that is, a group of individuals associated in fact and affiliated with the Genovese Organized Crime Family of "La Cosa Nostra", engaged in and the activities of which affected trade or commerce, purposely and knowingly did conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, including theft by extortion and commercial bribery, contrary to the provisions of N.J.S.A. 2C:41-2c;

Charge Number 2 (Theft by Extortion) -did purposefully and unlawfully obtain the property of others by extortion in that ANIELLO "SONNY" BELLO did purposely threaten to: cause officials to take or withhold action as an official; and inflict other harm of no substantial benefit to himself calculated to materially harm other persons; that is ANIELLO "SONNY" BELLO did, and did conspire with and aid others to extort money from the membership of the International Longshoreman's Association Local 1588 through his position as a hiring agent for Global Terminal, by threatening not to hire or failing to comply with union regulations for hiring those members who failed to pay, all contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6.

Charge Number 3 (Commercial Bribery) did knowingly solicit, accept or agree to accept, a benefit for knowingly violating or agreeing to violate a duty of fidelity to which he is subject as: an agent, partner or employee of another; an officer, director, manager or other participant in the direction of the affairs of an incorporated or unincorporated association; or a labor official, including any duly appointed representative of a labor organization or any duly appointed trustee or representative of an employee welfare trust fund, or did confer, or did offer or agree to confer any benefit the acceptance of which would be criminal under this section, that is ANIELLO "SONNY" BELLO did, and did conspire with and aid others in his capacity as a hiring agent for Global Terminal to collect payments from the Local 1588 membership in return for hiring union members on behalf of Global Terminal to fill work assignments and did as the hiring agent deny similar opportunities to members who did not pay, all contrary to the provisions of N.J.S.A. 2C:21-10 and N.J.S.A. 2C:2-6.

Charge Number 4 (Conspiracy) - did with other persons whose identities are both known and unknown to the Complainants, some of whom are named as coconspirators, with the purpose of promoting and facilitating the crimes of theft by extortion, commercial bribery and racketeering, agree that: a) one or more of them would engage in conduct which would constitute the aforesaid crimes, and b) one or more of them would aid in the planning, solicitation and commission of the aforesaid crimes, that is: theft by extortion as detailed in Charge Number 2, commercial bribery as detailed in Charge Number 3, and racketeering as detailed in Charge Number 1, all contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:41-2d;

NICHOLAS ROMANO

Charge Number 1 (Racketeering) - did commit the crime of racketeering, that is, the defendant and other persons employed by and associated with an enterprise, that is, a group of individuals associated in fact and affiliated with the Genovese Organized Crime Family of “La Cosa Nostra”, engaged in and the activities of which affected trade or commerce, purposely and knowingly did conduct and participate, directly and indirectly, in the conduct of the enterprise’s affairs through a pattern of racketeering activity, including theft by extortion and commercial bribery, contrary to the provisions of N.J.S.A. 2C:41-2c;

Charge Number 2 (Theft by Extortion) -did purposefully and unlawfully obtain the property of others by extortion in that NICHOLAS ROMANO did purposefully threaten to: cause officials to take or withhold action as an official; and inflict other harm of no substantial benefit to himself calculated to materially harm other persons; that is NICHOLAS ROMANO did, and did conspire with and aid others to extort money from the membership of the International Longshoreman’s Association Local 1588 through his former position as union shop steward at Global Terminal, by threatening to alter work schedules and withhold training and job assignments for those members who failed to pay, all contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6.

Charge Number 3 (Commercial Bribery) did knowingly solicit, accept or agree to accept, a benefit for knowingly violating or agreeing to violate a duty of fidelity to which he is subject as: an agent, partner or employee of another; an officer, director, manager or other participant in the direction of the affairs of an incorporated or unincorporated association; or a labor official, including any duly appointed representative of a labor organization or any duly appointed trustee or representative of an employee welfare trust fund, or did confer, or did offer or agree to confer any benefit the acceptance of which would be criminal under this section, that is NICHOLAS ROMANO did, and did conspire with and aid others in his former capacity as union shop steward of the International Longshoreman’s Association Local 1588 at Global Terminal to collect payments from the Local 1588 membership in return for prime job assignments, training for higher paying jobs and overtime assignments and did as the former union shop steward deny similar opportunities to members who did not pay, all contrary to the provisions of N.J.S.A. 2C:21-10 and N.J.S.A. 2C:2-6.

Charge Number 4 (Conspiracy) - did with other persons whose identities are both known and unknown to the Complainants, some of whom are named as coconspirators, with the purpose of promoting and facilitating the crimes of theft by extortion, commercial bribery and racketeering, agree that: a) one or more of them would engage in conduct which would constitute the aforesaid crimes, and b) one or more of them would aid in the planning, solicitation and commission of the aforesaid crimes, that is: theft by extortion as detailed in Charge Number 2, commercial bribery as detailed in Charge Number 3, and racketeering as detailed in Charge Number 1, all contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:41-2d;

JOHN TIMPANARO

Charge Number 1 (Racketeering) - did commit the crime of racketeering, that is, the defendant and other persons employed by and associated with an enterprise, that is, a group of individuals associated in fact and affiliated with the Genovese Organized Crime Family of "La Cosa Nostra", engaged in and the activities of which affected trade or commerce, purposely and knowingly did conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, including theft by extortion and commercial bribery, contrary to the provisions of N.J.S.A. 2C:41-2c;

Charge Number 2 (Theft by Extortion) -did purposefully and unlawfully obtain the property of others by extortion in that JOHN TIMPANARO did purposefully threaten to: cause officials to take or withhold action as an official; and inflict other harm of no substantial benefit to himself calculated to materially harm other persons; that is JOHN TIMPANARO did, and did conspire with and aid others to extort money from the membership of the International Longshoreman's Association Local 1588 through his position as vice president and president of Local 1588, by threatening to alter work schedules and withhold training and job assignments for those members who failed to pay, all contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6.

Charge Number 3 (Commercial Bribery) did knowingly solicit, accept or agree to accept, a benefit for knowingly violating or agreeing to violate a duty of fidelity to which he is subject as: an agent, partner or employee of another; an officer, director, manager or other participant in the direction of the affairs of an incorporated or unincorporated association; or a labor official, including any duly appointed representative of a labor organization or any duly appointed trustee or representative of an employee welfare trust fund, or did confer, or did offer or agree to confer any benefit the acceptance of which would be criminal under this section, that is JOHN TIMPANARO did, and did conspire with and aid others in his capacity as vice president and president of Local 1588 of the International Longshoreman's Association to collect payments from the Local 1588 membership in return for prime job assignments, training for higher paying jobs and overtime assignments and did as the vice president and president of Local 1588 deny similar opportunities to members who did not pay, all contrary to the provisions of N.J.S.A. 2C:21-10 and N.J.S.A. 2C:2-6.

Charge Number 4 (Conspiracy) - did with other persons whose identities are both known and unknown to the Complainants, some of whom are named as coconspirators, with the purpose of promoting and facilitating the crimes of theft by extortion, commercial bribery and racketeering, agree that: a) one or more of them would engage in conduct which would constitute the aforesaid crimes, and b) one or more of them would aid in the planning, solicitation and commission of the aforesaid crimes, that is: theft by extortion as detailed in Charge Number 2, commercial bribery as detailed in Charge Number 3, and racketeering as detailed in Charge Number 1, all contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:41-2d;

CARLO BILANCIONE

Charge Number 1 (Racketeering) - did commit the crime of racketeering, that is, the defendant and other persons employed by and associated with an enterprise, that is, a group of individuals associated in fact and affiliated with the Genovese Organized Crime Family of “La Cosa Nostra”, engaged in and the activities of which affected trade or commerce, purposely and knowingly did conduct and participate, directly and indirectly, in the conduct of the enterprise’s affairs through a pattern of racketeering activity, including theft by extortion and commercial bribery, contrary to the provisions of N.J.S.A. 2C:41-2c;

Charge Number 2 (Theft by Extortion) -did purposefully and unlawfully obtain the property of others by extortion in that CARLO BILANCIONE did purposely threaten to: cause officials to take or withhold action as an official; and inflict other harm of no substantial benefit to himself calculated to materially harm other persons; that is CARLO BILANCIONE did, and did conspire with and aid others to extort money from the membership of the International Longshoreman’s Association Local 1588 through his former position as Local 1588's field boss at Global Terminal, by threatening to alter work schedules and withhold training and job assignments for those members who failed to pay, all contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6.

Charge Number 3 (Commercial Bribery) did knowingly solicit, accept or agree to accept, a benefit for knowingly violating or agreeing to violate a duty of fidelity to which he is subject as: an agent, partner or employee of another; an officer, director, manager or other participant in the direction of the affairs of an incorporated or unincorporated association; or a labor official, including any duly appointed representative of a labor organization or any duly appointed trustee or representative of an employee welfare trust fund, or did confer, or did offer or agree to confer any benefit the acceptance of which would be criminal under this section, that is CARLO BILANCIONE did, and did conspire with and aid others in his former capacity as field boss of the International Longshoreman’s Association Local 1588 at Global Terminal to collect payments from the Local 1588 membership in return for prime job assignments, training for higher paying jobs and overtime assignments and did as the former field boss deny similar opportunities to members who did not pay, all contrary to the provisions of N.J.S.A. 2C:21-10 and N.J.S.A. 2C:2-6.

Charge Number 4 (Conspiracy) - did with other persons whose identities are both known and unknown to the Complainants, some of whom are named as coconspirators, with the purpose of promoting and facilitating the crimes of theft by extortion, commercial bribery and racketeering, agree that: a) one or more of them would engage in conduct which would constitute the aforesaid crimes, and b) one or more of them would aid in the planning, solicitation and commission of the aforesaid crimes, that is: theft by extortion as detailed in Charge Number 2, commercial bribery as detailed in Charge Number 3, and racketeering as detailed in Charge Number 1, all contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:41-2d;

ANTHONY D'ERRICO

Charge Number 1 (Racketeering) - did commit the crime of racketeering, that is, the defendant and other persons employed by and associated with an enterprise, that is, a group of individuals associated in fact and affiliated with the Genovese Organized Crime Family of "La Cosa Nostra", engaged in and the activities of which affected trade or commerce, purposely and knowingly did conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, including theft by extortion and commercial bribery, contrary to the provisions of N.J.S.A. 2C:41-2c;

Charge Number 2 (Theft by Extortion) -did purposefully and unlawfully obtain the property of others by extortion in that ANTHONY D'ERRICO did purposefully threaten to: cause officials to take or withhold action as an official; and inflict other harm of no substantial benefit to himself calculated to materially harm other persons; that is ANTHONY D'ERRICO did, and did conspire with and aid others to extort money from the membership of the International Longshoreman's Association Local 1588 through his position as Local 1588's field boss at Global Terminal, by threatening to alter work schedules and withhold training and job assignments for those members who failed to pay, all contrary to the provisions of N.J.S.A. 2C:20-5 and N.J.S.A. 2C:2-6.

Charge Number 3 (Commercial Bribery) did knowingly solicit, accept or agree to accept, a benefit for knowingly violating or agreeing to violate a duty of fidelity to which he is subject as: an agent, partner or employee of another; an officer, director, manager or other participant in the direction of the affairs of an incorporated or unincorporated association; or a labor official, including any duly appointed representative of a labor organization or any duly appointed trustee or representative of an employee welfare trust fund, or did confer, or did offer or agree to confer any benefit the acceptance of which would be criminal under this section, that is ANTHONY D'ERRICO did, and did conspire with and aid others in his capacity as field boss of the International Longshoreman's Association Local 1588 at Global Terminal to collect payments from the Local 1588 membership in return for prime job assignments, training for higher paying jobs and overtime assignments and did as the field boss deny similar opportunities to members who did not pay, all contrary to the provisions of N.J.S.A. 2C:21-10 and N.J.S.A. 2C:2-6.

Charge Number 4 (Conspiracy) - did with other persons whose identities are both known and unknown to the Complainants, some of whom are named as coconspirators, with the purpose of promoting and facilitating the crimes of theft by extortion, commercial bribery and racketeering, agree that: a) one or more of them would engage in conduct which would constitute the aforesaid crimes, and b) one or more of them would aid in the planning, solicitation and commission of the aforesaid crimes, that is: theft by extortion as detailed in Charge Number 2, commercial bribery as detailed in Charge Number 3, and racketeering as detailed in Charge Number 1, all contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:41-2d;