

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

v. : Magistrate Case No. 13- 7202

MARIO RODRIGUEZ, :
a/k/a "Mad Dog," and :
ANTHONY ROMAN :

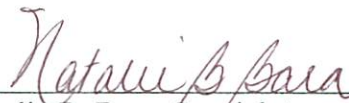
I, Natalie B. Bara, being duly sworn state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

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 B

Continued on the attached pages and made a part hereof.



Natalie B. Bara, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, on this 1st day of August, 2013, in Newark, New Jersey.

HONORABLE CATHY L. WALDOR
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

In or about July 3, 2013, in Hudson County, in the District of New Jersey and elsewhere,
defendant

MARIO RODRIGUEZ,
a/k/a "Mad Dog"

did knowingly embezzle, steal, and unlawfully take, carry away, and conceal from a motortruck, trailer, other vehicle, storage facility, station, station house, platform, depot, intermodal container, trailer, container freight station, warehouse, and freight consolidation facility, with intent to convert to his own use, goods and chattels, valued in excess of \$1,000, moving as and which were a part of and which constituted an interstate and foreign shipment of freight, express, and other property; and did buy and receive and have in his possession any such goods and chattels, knowing the same to have been embezzled and stolen.

In violation of Title 18, United States Code, Section 659.

COUNT TWO

On or about July 24, 2013, in Hudson County, in the District of New Jersey and elsewhere,
defendants

MARIO RODRIGUEZ,
a/k/a "Mad Dog," and
ANTHONY ROMAN

knowingly and intentionally conspired with each other and with others to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion, that is, by obtaining the property of another person, with the consent of such person, induced by wrongful use of actual and threatened force, violence, and fear.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

ATTACHMENT B

I, Natalie B. Bara, am a Special Agent of the Federal Bureau of Investigation and based upon my investigation and my discussions with other individuals involved in this investigation, I have knowledge of the facts which appear below.

COUNT ONE

1. On or about July 3, 2013, at the direction of law enforcement, a Confidential Informant with a proven record of reliability and credibility (hereinafter the "CI") met with defendant Mario Rodriguez, a/k/a "Mad Dog," who is a Jersey City, New Jersey police officer (hereinafter "defendant RODRIGUEZ"), at a location in Jersey City, New Jersey. Prior to the meeting, law enforcement provided CI with a recording device. During the meeting, CI informed defendant RODRIGUEZ, in substance and in part, that they would be driving to a warehouse in Secaucus, New Jersey in order to break into a trailer and steal cigarettes which were inside of the trailer. CI also informed defendant RODRIGUEZ that they would be selling the cigarettes to CI's associate for \$5,000.

2. Defendant RODRIGUEZ and CI then drove to a warehouse in Secaucus, New Jersey. Prior to their arrival, law enforcement agents had established surveillance of the area and had parked a locked trailer containing cigarettes and several televisions. Upon their arrival at the warehouse, defendant RODRIGUEZ and CI used bolt cutters to cut the lock off of the trailer. They then took 50 cases containing approximately 600,000 cigarettes from the trailer and placed them into their vehicle. Defendant RODRIGUEZ and CI also took six televisions which were inside the trailer and placed them into their vehicle. The two then reentered their vehicle and drove to a parking lot in Staten Island, New York. As they did so, defendant RODRIGUEZ called several individuals on his cell phone to ask if they would be interested in the televisions.

3. Once defendant RODRIGUEZ and CI arrived at the parking lot in Staten Island, they met CI's purported associate, who was in reality a law enforcement agent acting in an undercover capacity (hereinafter "UC-1"). In exchange for the cigarettes, UC-1 gave \$5,000 in United States currency to defendant RODRIGUEZ and CI. Defendant RODRIGUEZ kept \$3,000 of this money for himself, as well as three of the televisions.

COUNT TWO

4. On or about July 10, 2013, defendant RODRIGUEZ and CI met with UC-1 and another law enforcement agent acting in an undercover capacity (hereinafter "UC-2") at a location in New Jersey. At the meeting, defendant RODRIGUEZ, CI, UC-1, and UC-2 discussed the possibility of robbing a purported female drug courier who was an associate of UC-1 and UC-2. In reality, the female drug courier was another law enforcement agent acting in an undercover capacity (hereinafter "UC-3"). Defendant RODRIGUEZ (who told UC-1 and UC-2 that he was a Bayonne police officer), indicated that he would be willing to rob UC-3 of drug sale proceeds.

5. On or about July 24, 2013, defendant RODRIGUEZ and CI met with UC-1 and UC-2 at a location in Staten Island, New York to discuss robbing UC-3. Specifically, UC-1 and UC-2 informed defendant RODRIGUEZ that UC-3 would be delivering cocaine for them that day, and that in return, she would be receiving \$20,000 in United States currency. The parties then agreed on a plan whereby defendant RODRIGUEZ would approach UC-3 after she delivered the cocaine, and then rob her of the \$20,000. The parties agreed that the robbery would take place in a mall parking lot in Jersey City, New Jersey, which defendant RODRIGUEZ believed was a good location due to the absence of surveillance cameras in the area. Defendant RODRIGUEZ then stated that he would have to find another person to assist him with the robbery, since it would look strange if he was the only participant. Defendant RODRIGUEZ then called defendant ANTHONY ROMAN (hereinafter "defendant ROMAN") and told him that he needed defendant ROMAN to help him with something that day.

6. The parties then agreed that they would meet at a casino in Pennsylvania after the completion of the robbery, and that they would split the \$20,000 between them. Specifically, the parties agreed that defendant RODRIGUEZ would receive \$10,000 from which he would pay defendant ROMAN, and that UC-1 and UC-2 would receive the remaining \$10,000.

7. Later that day, defendant RODRIGUEZ and defendant ROMAN drove a Toyota RAV-4 truck (hereinafter the "Toyota") into the mall parking lot in Jersey City, New Jersey. Prior to their arrival, law enforcement agents had established surveillance of the parking lot and had parked a vehicle containing \$20,000 in United States currency in a black plastic bag in the trunk of the vehicle, which were the purported proceeds of the cocaine sale to UC-3. CI and UC-3 were standing next to the open trunk of the vehicle when defendant RODRIGUEZ and defendant ROMAN arrived in the parking lot. After exiting the Toyota, defendant RODRIGUEZ and defendant ROMAN approached CI and UC-3 and identified themselves as law enforcement officers. They then ordered CI and UC-3 to get into their vehicle, at which point defendant RODRIGUEZ displayed a badge which was hanging on a chain around his neck. CI and UC-3 then got into their vehicle as ordered, whereupon defendant RODRIGUEZ stated that he had been investigating CI for a period of time, and that he and defendant ROMAN were going to arrest CI for conspiracy.

8. Defendant RODRIGUEZ and defendant ROMAN then asked what was in the car, and asked if there were guns or drugs in the car. CI and UC-3 stated that they did not have any such items in the car, but CI stated that they had money. Defendant RODRIGUEZ threatened to call more law enforcement officers to the scene and that UC-3 would get in trouble as well. CI then walked to the trunk of the car and gave defendant ROMAN the plastic bag containing the \$20,000 in United States currency. Defendant ROMAN took the plastic bag containing the cash and acted as if CI was under arrest, placing him in the Toyota.

9. Defendant RODRIGUEZ then told UC-3 to leave the scene. UC-3 objected and stated that the money that they had taken was her rent money. Defendant RODRIGUEZ asked UC-3 how much money was in the bag, to which UC-3 responded \$20,000. Defendant RODRIGUEZ

scoffed at the idea that this was UC-3's rent money, and told UC-3 that she was free to leave. Defendant RODRIGUEZ then entered the Toyota with defendant ROMAN and CI, and the three drove away.

10. Later that day, defendant RODRIGUEZ and CI met UC-1 and UC-2 in the hotel room of a casino in Pennsylvania. Defendant RODRIGUEZ had kept \$10,000 of the money, and in the hotel room, UC-1 and UC-2 were given the remaining \$10,000. Defendant RODRIGUEZ told them that UC-3 was scared during the robbery, and that he had encountered no problems during the robbery.