

AO 91 (Rev. 5/85) Criminal Complaint

United States District Court

DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

V.

ANTHONY ST. LAURENT, SR.,
aka, "The Saint"

REDACTED

(Name and Address of Defendant)

CRIMINAL COMPLAINT

CASE NUMBER:

1:09MJ11A

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 12, 2006 in Providence county, in the

District of Rhode Island defendant(s) did, (Track Statutory Language of Offense)

with intent that another person engage in conduct constituting a felony that has as an element the use, attempted or threatened use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and otherwise endeavor to persuade such other person to engage in such conduct, to wit, murder-for-hire, in violation of 18 U.S.C. § 1958,

in violation of Title 18 United States Code, Section(s) 373.

I further state that I am a(n) Special Agent with the FBI and that this complaint is based on the following

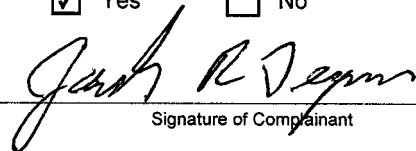
Official Title

facts:

see attached affidavit

Continued on the attached sheet and made a part hereof:

Yes No


Signature of Complainant

Sworn to before me and subscribed in my presence,

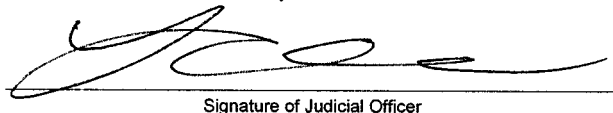
1/23/09
Date

at

Providence, Rhode Island
City and State

LINCOLN D. ALMOND
U.S. Magistrate Judge

Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, JOSEPH R. DEGNAN, sworn upon oath, do depose and say:

1. I am a Special Agent for the Federal Bureau of Investigation ("FBI"), United States Department of Justice, and have been so employed for over 22 years. Since December 2000, I have been assigned to the Organized Crime Squad of the Providence Resident Agency of the FBI, where I have been investigating organized crime, in particular the New England branch of La Cosa Nostra (LCN), also known as the Patriarca Crime Family.

2. This affidavit is submitted in support of a request for an arrest warrant for ANTHONY ST. LAURENT, SR, *aka* "The Saint", formerly of Johnston, Rhode Island and now an inmate at the federal prison medical center at Fort Devens, Massachusetts, for a violation of Title 18, United States Code Section 373, Solicitation to Commit a Crime of Violence.

3. The facts and information contained in this affidavit are based upon my own knowledge gained in the course of this investigation, and on facts and information supplied to me by fellow FBI Special Agents and other members of law enforcement.

4. In the Spring of 2006, I received information from a cooperating witness, hereinafter referred to as Source 1, that ANTHONY ST. LAURENT, SR, (hereafter "ST. LAURENT") had approached Source 1 and other individuals in an effort to get them to participate in a scheme to extort money from two then unknown victims. Source 1 has an extensive criminal record and on at least one occasion has lied to the FBI and unlawfully retained money provided him during investigative activity. The information he provided during this extortion investigation was corroborated, however, by audio recordings made by Source 1 on a recording device I provided to him. Based on the information provided by Source 1, ST. LAURENT was charged in April 2006 with Conspiracy to Collect Extensions of Credit by Extortionate Means, in violation of 18

U.S.C. § 894. The information provided by Source 1 led directly to ST. LAURENT's guilty plea in this Court in Criminal Case Number 06-048S, as well as the guilty pleas of three other individuals involved in the extortion scheme.

5. On April 7, 2006, during the course of the above-referenced extortion investigation, Source 1 called me to advise that ST. LAURENT had just called Source 1 and demanded that Source 1 come to see him immediately. There was insufficient time to provide Source 1 with a recording device for this meeting. Immediately after the meeting at ST. LAURENT's Johnston, Rhode Island home, I met with Source 1 who informed me that ST. LAURENT had offered Source 1 and another individual (who was not present) approximately \$20,000 to kill Robert "Bobby" DeLuca, an individual who I know to be a *capo* or captain, in the New England LCN. Source 1 advised me that there was to be another meeting at ST. LAURENT's home the next day to discuss the matter further.

6. I met with Source 1 on April 8, 2006 and provided him with a recording device prior to the next meeting at ST. LAURENT's home. The following information is based on my review of that recording: Source 1 and the other individual who had been mentioned the previous night, identified as Ricky Silva, arrived at ST. LAURENT's home and initially began discussing the extortion scheme which had culminated in a failed effort to find the planned extortion victims on April 6, 2006. ST. LAURENT interrupted to direct the conversation to his effort to procure DeLuca's murder, stating "you interested in that other thing he told you, you told him?" He then asked Source 1: "You told him, right?...You interested in that?", referring to whether or not Source 1 had conveyed the solicitation from the previous evening to Silva. Both Source 1 and Silva expressed their reluctance based on their knowledge that DeLuca is a "made" member of

the LCN and that to kill a member without proper authorization would engender retribution. ST. LAURENT responded to their concerns by repeatedly telling them there would be “no repercussions.” Based on my years investigating the LCN, this means that he is indicating that he has received permission from the “boss” of the New England LCN to kill DeLuca. ST. LAURENT made this explicit later in the conversation when Source 1 stated that if he and Silva were to kill DeLuca, “we don’t want to have a problem with Louie afterwards.” ST. LAURENT responded by saying: “No repercussions. If you want, after it’s done, I’ll take you to him, if you want me to.” Based on my years of investigating organized crime in Rhode Island, I know that both Source 1 and ST. LAURENT are referring to Louis Manocchio, the current head of the New England LCN.

7. Later in the conversation, ST. LAURENT tried to assuage their doubts about killing a “made guy” by indicating that were it not for physical ailments, he would not need to hire killers: “...I just can’t walk, if I could be walking, we wouldn’t be here talking about it, you know what I mean...” The meeting at ST. LAURENT’s home on April 8, 2006 ended without either Source 1 or Silva agreeing to accept the offer to kill DeLuca. ST. LAURENT urged them to make a decision soon, indicating “I need to make this go away...give me an answer either way.” The conversation briefly turned back to the ongoing extortion effort, then as Source 1 and Silva were leaving, ST. LAURENT told them: “The main thing is Bobby, that’s my main thing.” The recording corroborates information from Source 1 that ST. LAURENT offered Source 1 and Silva a sum of money to kill DeLuca that would come from an insurance settlement ST. LAURENT was anticipating that his daughter would receive. Further, I have confirmed that in April 2006, ST. LAURENT’s daughter was a plaintiff in a medical malpractice lawsuit initiated

in the Southern District of New York on December 6, 2004.

8. On several occasions beginning in January 2007 through November 2008, I have interviewed an individual from Massachusetts who was involved in the above-referenced extortion scheme and eventually plead guilty to Interstate Travel in Aid of Racketeering. This individual is now a cooperating witness and will hereafter be referred to as Source 2. Source 2 has a lengthy criminal history and has admitted in a recent debriefing that in an earlier interview he falsely denied involvement in an extortion and assault. Source 2 has told me that ST. LAURENT recruited him into the extortion scheme in an arranged meeting in the parking lot of a Stop & Shop grocery store in Rhode Island. Source 2 participated in the unsuccessful effort to find the extortion victims on April 6, 2006. Shortly afterwards, he had a telephone conversation with ST. LAURENT in which ST. LAURENT indicated that he wanted to meet Source 2 in the parking lot of the same Stop & Shop grocery store in Rhode Island, where they had first met prior to launching the extortion scheme that was largely completed on April 6, 2006. Cell phone records confirm a call from Source 2's phone to ST. LAURENT's home phone on April 11, 2006. Source 2 told me that he placed this call to advise ST. LAURENT that he could not meet him that night but would meet him the following evening, April 12, 2006.

9. On April 12, 2006, Source 2 drove from his home in Massachusetts into Rhode Island in order to meet ST. LAURENT at the grocery store parking lot. He has advised me that at ST. LAURENT's direction, he then got into ST. LAURENT's vehicle and they began driving towards Providence. During the drive, ST. LAURENT asked him if he knew who "Bobby" DeLuca was and then asked Source 2 to kill DeLuca. As incentive, he offered a sum of money that he would receive from extorting an individual who was then allegedly paying DeLuca and

would be forced to pay ST. LAURENT once DeLuca was killed. Source 2 questioned ST. LAURENT's authority to have a "made" LCN member killed. ST. LAURENT replied that he had permission to kill DeLuca and would take him to see "Lou" to prove it. Again, I believe this is a reference to New England LCN boss Louis Manocchio.¹

10. Source 2 has advised me that the purpose of their trip into Providence was for ST. LAURENT to point out where Robert DeLuca could be located. ST. LAURENT directed him to a bar/restaurant where he said DeLuca was employed. Source 2 was not able to remember the name of the establishment in interviews with me, however, I am aware that during his work-release from prison in April 2006, DeLuca was employed at the Sidebar & Grille on Dorrance Street in downtown Providence.

11. I arrested ST. LAURENT the following day, April 13, 2006, and he has been in federal custody ever since. During ST. LAURENT's incarceration, I received information that he was soliciting other inmates to kill DeLuca. This information led me to a cooperating witness (Source 3) who alleged that ST. LAURENT had indicated to him that he was looking for someone who would kill DeLuca. At my direction, Source 3 advised ST. LAURENT that he knew of someone who might be interested in the job. In order to meet this individual, ST. LAURENT arranged to have his family come visit him on December 6, 2007, the same day that an undercover police officer, posing as the prospective hit-man, arranged to "visit" Source 3.

¹ In January, 2007, Source 2 gave a post-arrest statement in which he stated that ST. LAURENT also solicited him to kill DeLuca at their first Stop & Shop meeting, prior to the April 6, 2006 extortion attempt. In subsequent debriefings, however, his recollection is that it was only at the second meeting, described above in paragraph 9, that ST. LAURENT asked him to kill DeLuca.

12. On December 6, 2007, I provided Source 3 with a recording device. The following information is based on my review of the recording made on December 6, 2007: while talking together prior to entering the visitors' room, ST. LAURENT told Source 3 to tell his visitor that "there's no repercussions" to killing DeLuca. He further informed Source 3 that though his reasons for wanting DeLuca killed are "none of his [the undercover visitor's] business", his motives are that he "hates" him and has other "reasons with him." ST. LAURENT again assured Source 3 that there will be no repercussions or retaliation arising from the murder and if questioned by organized crime figures as to his authorization to kill a "made" LCN member, the hit-man should "say 'I listen to Saint' 'Get in touch with Saint' That's all you tell him to say."

13. When asked by Source 3 how he would like DeLuca murdered and whether any message should be delivered at the time, ST. LAURENT said: "Shoot him in the fucking head....Say 'This is from The Saint'." Later, Source 3 (S3) comments that after DeLuca is murdered, he and St. LAURENT (ASL) will need to stay away from each other because:

S3: I don't know who they'll have, you know, as a suspect. He probably has a lot of enemies.

ASL: Yeah he does. He's got lots of them. I'll be a suspect.

S3: What?

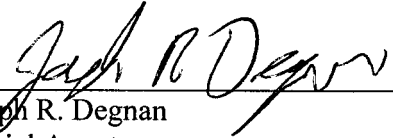
ASL: I'll be a suspect.

S3: Why would you be a suspect?

ASL: Ah, because they know I tried to kill him already.

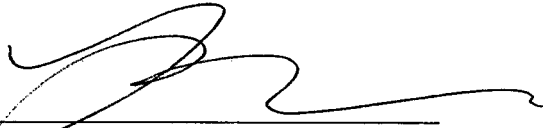
14. Based on the foregoing, I submit there is probable cause to believe that on or about April 12, 2006, in the District of Rhode Island, ANTHONY ST. LAURENT, SR., with intent that another person engage in conduct constituting a felony that has as an element the use, attempted or threatened use of physical force against the person of another in violation of the

laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and otherwise endeavor to persuade such other person to engage in such conduct, that is, to use and cause another to use a facility of interstate commerce with intent that a murder be committed in violation of the laws of Rhode Island as consideration for the receipt of or for a promise or agreement to pay anything of pecuniary value, in violation of Title 18 United States Code Section 1958, and thereby violated 18 U.S.C. § 373.



Joseph R. Degan
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before
me this 23rd day of January, 2009
at Providence, Rhode Island



Lincoln D. Almond
United States Magistrate Judge