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Supporting Affidavits Sealed	
<input type="checkbox"/> YES	<input type="checkbox"/> NO

AGENCY NAME Office of the Chief State's Attorney	AGENCY NO. PID7-026
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NAME AND RESIDENCE (Town) OF ACCUSED <b>Louis DeLuca</b>	COURT TO BE HELD AT (Town) <b>Waterbury</b>	G.J. NO. <b>4</b>
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**APPLICATION FOR ARREST WARRANT**

TO: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above named accused on the basis of the facts set forth in the ...  AFFIDAVIT BELOW.  AFFIDAVIT(S) ATTACHED.

DATE AND SIGNATURE	DATE 5/30/07	SIGNED (Prosecutorial Official) <i>Michael [Signature]</i>	TYPE/PRINT NAME OF PROSECUTING AUTHORITY
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**AFFIDAVIT**

The undersigned, being duly sworn, deposes and says:

- I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed for five years. Prior to joining the FBI, I was a police officer with the Seekonk (Massachusetts) and the East Providence (Rhode Island) Police Departments for approximately eight and one-half years. During my tenure as an agent for the FBI and as a police officer, I participated in numerous narcotics investigations, and I have received specialized training in this field. Specifically, I have attended the Title III Techniques In-Service conducted by the FBI; have attended a regional conference sponsored by the Northeast Counter-Drug Training Center; have been a co-case agent on investigation involving over ten Title III applications, have been the affiant and co-case agent on one Title III narcotics investigation; have been the affiant on numerous federal search and/or seizure warrants; have been the co-case agent on a large scale RICO investigation involving organized crime, have also been a case agent in several narcotics and fugitive investigations resulting in federal and state convictions of numerous individuals; have testified in federal grand jury investigations, which testimony has contributed to the indictment of several individuals; and I have participated in numerous arrests of individuals charged with violation of federal law.
- This affidavit sets forth facts and evidence that are relevant to the charge cited at the end of this affidavit, but does not set forth all of the facts and evidence that I have gathered during the course of the investigation of this matter. The information contained in this affidavit is based upon my own personal knowledge, as well as information provided to me by Special Agents of the FBI, Special Agents of the IRS-CI, state law enforcement agents, court authorized electronic surveillance, search warrants and cooperating sources. This affidavit does not purport to set forth all of the relevant information I have learned during the course of the investigation. Rather, I have set forth only those facts that I believe necessary to support the charge cited at the end of this affidavit.

(This is page 1 of Page Affidavit)

DATE AND SIGNATURE	DATE 5/30/07	SIGNED (Affiant) <i>Jeffrey P. White</i>
JURAT	SUBSCRIBED AND SWORN TO BEFORE ME ON (Date) 5/30/07	SIGNED (Judge/Clerk, Comm-Sup, Ct. Notary Public) <i>[Signature]</i>

FINDING

The foregoing Application for and arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

DATE AND SIGNATURE	SIGNED AT (City or Town) East Hartford CT	ON (Date) 5/30/07	SIGNED (Judge/Judge Trial Referee) <i>[Signature]</i>	NAME OF JUDGE/JUDGE TRIAL REFEREE <i>Alexander</i>
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<b>NAME AND RESIDENCE (Town) OF ACCUSED</b> Louis DeLuca	<b>COURT TO BE HELD AT (Town)</b> Waterbury	<b>G. A. NO.</b> 4
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**AFFIDAVIT**

The undersigned affiant, being duly sworn, deposes and says:

- During the course of an investigation through examination of public documents I learned that Businessman A operates several trash hauling companies in western Connecticut. On June 8, 2006, Businessman A was named as a defendant in a 117-count federal indictment that alleges, *inter alia*, that Businessman A was a member of a racketeering enterprise. Businessman A has pleaded not guilty to all of the charges and the charges against him are still pending.
- Based on records seized during a search of Businessman A's office during the execution of a search warrant, I learned that Businessman A has ties to organized crime. The records revealed that, for a period of several years that ended in approximately June, 2005, Businessman A paid \$120,000 per year in "tribute payments" to Matthew "Matty the Horse" Ianneillo, a high ranking member of the Genovese crime family. On or about December 20, 2006, Matthew Ianneillo pleaded guilty in a United States District Court and admitted that he received these tribute payments.
- During the course of the investigation I learned, that Businessman A has known Louis DeLuca, a ranking member of the Connecticut legislature, since at least 2001. In 2001, Businessman A made a large contribution to a legitimate charitable cause sponsored by DeLuca. Thereafter, DeLuca used his influence to cause Businessman A to be named "Italian-American Man of the Year" by the Connecticut Italian-American legislative caucus. These facts were later confirmed by DeLuca.
- During the course of the investigation I learned, and DeLuca later admitted, that in approximately April, 2005, DeLuca contacted Businessman A and arranged to meet him at the Philip's Diner in Woodbury, Connecticut. At that meeting, DeLuca explained to Businessman A that a member of DeLuca's family had been the victim of domestic violence. During the course of the conversation, Businessman A passed DeLuca a note containing the written question, "Do you want me to have someone pay him a visit?" DeLuca said "yes" and provided Businessman A with the name and address of the intended target.
- In July of 2005, during the execution of a court-authorized search warrant at Businessman A's office in Danbury, Connecticut, a note written on the back of a diner ticket was seized. The note contained the written question note, "Do you want me to have someone pay him a visit?" Upon information and belief, this is the same note that Businessman A passed to DeLuca at the diner. Thus, it is apparent that Businessman A retained the note.

<b>DATE AND SIGNATURE</b>	DATE 5/30/07	SIGNED (Affiant) <i>Jeffrey DeLuca</i>
<b>JURAT</b>	SUBSCRIBED AND SWORN TO BEFORE ME ON (Date) 5-30-07	SIGNED (Judge/Clerk, Comm. Sup. Ct., Notary Public) <i>[Signature]</i>
REVIEWED (Prosecutorial Official) <i>Michael [Signature]</i>	DATE 5/30/07	REVIEWED (Judge / Judge Trial Referee) <i>[Signature]</i>
This is page 2 of a 4 page affidavit		DATE 5/30/07

NAME AND RESIDENCE (Town) OF ACCUSED Louis DeLuca	COURT TO BE HELD AT (Town) Waterbury	G. A. NO. 4
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**AFFIDAVIT**

The undersigned affiant, being duly sworn, deposes and says:

8. Cooperating Source 1 is an individual who had not previously provided information to law enforcement. The information provided by Cooperating Source 1 during the course of this investigation has proven to be reliable and has been corroborated by information obtained through court ordered wiretaps, physical surveillance, and evidence obtained through search warrants. I have also determined that Cooperating Source 1 does not have a criminal history. During the course of this investigation, however, Cooperating Source 1 did admit that in 2004 he stole a car. Cooperating Source 1 advised law enforcement that Businessman A contacted his associates and instructed them that the target identified by DeLuca should be "bitch slapped," meaning that the target should be physically assaulted. Intercepted telephone calls also revealed that Businessman A's associates discussed this matter.
9. Court authorized wiretaps also revealed that in early April, 2005, Businessman A's associates discussed driving to the target's place of employment in Waterbury, Connecticut, on April 9, 2005, to carry out Businessman A's directive. Federal and state officers learned of this plan and, on or about April 9, 2005, drove to the residence of one of Businessman A's associates. A state police detective, who was known to Businessman A's associate, allowed the associate to see him in an unmarked police vehicle. Subsequently, intercepted telephone conversations revealed that Businessman A's associate cancelled the planned "visit" to the target identified by DeLuca based on his sighting of the state police detective outside of his residence. Thus, DeLuca's desire to have the target "visited" was successfully thwarted by the intervention of state and federal authorities. In a subsequent conversation, however, Businessman A told DeLuca that the target had been visited and there "was a lot of screaming."
10. During the course of the investigation, I have also learned that DeLuca has a close and confidential relationship with Businessman A, one that would explain why DeLuca would seek out Businessman A's assistance and why Businessman A would be willing to help DeLuca. For example, on September 5, 2006, an undercover federal agent, posing as an associate of Businessman A, met with DeLuca. During that discussion, DeLuca told the undercover agent that "anytime [Businessman A] needs anything, anything, within my power, that I can do, I will do." DeLuca also told the undercover agent that he was "shocked" when Businessman A was indicted, because "he [Businessman A] is not a careless guy." When the undercover agent speculated that someone had "spilled something," DeLuca said "it had to be some, some bastard, but, you know, he's not a careless man." DeLuca advised the undercover agent that "if you guys need me anymore" the best way to make contact was through a specific individual, because "nobody knows [about] that relationship."

DATE AND SIGNATURE	DATE 5/30/07	SIGNED (Affiant) <i>Jeffrey DeLuca</i>
JURAT	SUBSCRIBED AND SWORN TO BEFORE ME ON (Date) 5-30-07	SIGNED (Judge/Clerk, Comm. Sup. Ct., Notary Public) <i>[Signature]</i>
REVIEWED (Prosecutorial Official) <i>Michael [Signature]</i>	DATE 5-30-07	REVIEWED (Judge / Judge Trial Referee) <i>[Signature]</i>
		DATE 5/30/07

INSTRUCTIONS

The Jurat is to be completed for each page of the affidavit.  
The prosecutorial official and judge/judge trial referee are to date  
and sign or initial each page to indicate that they have reviewed it.

NAME AND RESIDENCE (Town) OF ACCUSED Louis DeLuca	COURT TO BE HELD AT (Town) Waterbury	G. A. NO. 4
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**AFFIDAVIT**

The undersigned affiant, being duly sworn, deposes and says:

11. The nature of the relationship was further demonstrated on September 7, 2006, when DeLuca met a second time with the undercover agent posing as an associate of Businessman A. During this meeting, DeLuca stated, among other things, that "I'll keep my eyes open. And understand that anything that could hurt [Businessman A], I'll try to blunt it as best I can." In response to the undercover agent's request that DeLuca help influence any proposed legislation that could have a negative impact on Businessman A, DeLuca stated: "I can't influence it at this point because it's out of my hands, but if it gets to the point where I have appointments, I can influence it that way. You know, if somebody, if it's a commission that needs to be in that, that, is gonna be a watchdog on CRRR and make recommendations then I'll make an appoi... generally I get an appointment." During this conversation, DeLuca refused five thousands dollars in cash from the undercover agent, saying he was "afraid of them guys . . . tracing things and shit like that." He later told the undercover agent to tell Businessman A to "hang in there and I'll keep my eyes and ears open."
12. On September 7, 2006, FBI agents interviewed DeLuca about his meeting in the diner with Businessman A. DeLuca stated that the conversation he had with Businessman A about the target was merely about securing employment for the target. On September 21, 2006, at a meeting with FBI agents at FBI headquarters in Meriden, Connecticut, DeLuca admitted that the true purpose of his meeting with Businessman A had nothing to do with securing employment for the target, but rather was to see if Businessman A could pay a visit to the target identified by DeLuca in order to scare him. DeLuca explained that he met with Businessman A to ask for help in the matter after the police informed him they could not resolve the problem without the filing of a formal complaint by the victim. DeLuca stated that he believed Businessman A was "on the fringes" of organized crime. DeLuca admitted that he contacted Businessman A and arranged to meet him at Philip's Diner in Woodbury, Connecticut.
13. Wherefore, the undersigned believes there is probable cause to believe that Louis DeLuca committed the crime of Conspiracy to Commit Threatening in the Second Degree in violation of Conn. Gen. Stat. §§ 53a-48 and 53a-62.

DATE AND SIGNATURE	DATE 5/30/07	SIGNED (Affiant) <i>Jeffrey D. Wilson</i>
JURAT	SUBSCRIBED AND SWORN TO BEFORE ME ON (Date) 5/30/07	SIGNED (Judge / Clerk, Comm. Sup. Ct., Notary Public) <i>[Signature]</i>
REVIEWED (Prosecutorial Official) <i>Michael [Signature]</i>	DATE 5/30/07	REVIEWED (Judge / Judge Trial Referee) <i>[Signature]</i>
		DATE 5/30/07

TITLE, ALLEGATION AND COUNTS		
STATE OF CONNECTICUT VS. (Name of accused) <b>Louis Deluca</b>	G.A. NO. <b>4</b>	DOCKET NO.
ADDRESS <b>77 Main Street North, Woodbury, CT</b>		The undersigned Deputy Assistant State Attorney of the Superior Court of the State of Connecticut charges that
FILED AT (City) <b>WOODBURY</b>	COURT DATE	

FIRST COUNT DID COMMIT THE OFFENSE OF	CONTINUED TO	PURPOSE	REASON
CONSPIRACY TO COMMIT Threatening in the second degree AT (City) <b>Woodbury</b> ON OR ABOUT (Date) <b>April 2005</b> IN VIOLATION OF GENERAL STATUTE NO. <b>53a-48, 53a-62</b>			
SECOND COUNT DID COMMIT THE OFFENSE OF AT (City) ON OR ABOUT (Date) IN VIOLATION OF GENERAL STATUTE NO.			
THIRD COUNT DID COMMIT THE OFFENSE OF AT (City) ON OR ABOUT (Date) IN VIOLATION OF GENERAL STATUTE NO.			
REPORTER(S) SHEET(S) FOR ADDITIONAL COUNTS:	DATE <b>4/20/07</b>	SIGNED (Deputy Asst. State Atty.)	

COURT ACTION			
DEFENDANT ADVISED OF RIGHTS BEFORE PLEA (JUDGE)	(DATE)	BOND	SURETY
<input type="checkbox"/> ATTORNEY <input type="checkbox"/> PUB. DEFENDER <input type="checkbox"/> GUARDIAN		BOND CHANGE	<input type="checkbox"/> 10% <input type="checkbox"/> ELECTION (Date) <input type="checkbox"/> CASH <input type="checkbox"/> CT <input type="checkbox"/> JY
			SEIZED PROP. INVENTORY NO.

COUNT	PLEA DATE	PLEA	PLEA WITHDRAWN DATE	NEW PLEA	VERDICT FINDING	FINE	REMIT	ADDITIONAL INFORMATION
1						\$	\$	
2						\$	\$	
3						\$	\$	

DATE	OTHER COURT ACTION	JUDGE

RECEIPT NO.	COST <input type="checkbox"/> IMP <input type="checkbox"/> NCI	BOND INFORMATION <input type="checkbox"/> BOND FORFEITED <input type="checkbox"/> FORFEITURE VACATED	FORFEITURE VACATED AND BOND REINSTATED
APPLICATION FEE - RECEIPT NO. IF PAID	CIRCLE ONE W I Q	PROGRAM FEE - RECEIPT NO. IF PAID	CIRCLE ONE W I Q
STATES ATTORNEY ON ORIGINAL DISPOSITION	REPORTER/MONITOR ON ORIG. DISP.	SIGNED (Clerk)	SIGNED (Judge)

