

Approved:

MARCIA ISAACSON/STEVEN D. FELDMAN
Assistant United States Attorneys

Before:

HONORABLE THEODORE H. KATZ
United States Magistrate Judge
Southern District of New York

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COMPLAINT

UNITED STATES OF AMERICA :

Violation of
18 U.S.C. §§ 1503 & 2

-v.- :

STEVEN ROMBOM, :

a/k/a "Steven Rambam," :

COUNTY OF OFFENSE:
NEW YORK COUNTY

Defendant. :

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SOUTHERN DISTRICT OF NEW YORK, ss.:

THEODORE V. CACIOPPI, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation, and charges as follows:

COUNT ONE

1. In or about April 2006, in the Southern District of New York and elsewhere, STEVEN ROMBOM, a/k/a "Steven Rambam," the defendant, unlawfully, wilfully, knowingly and corruptly did influence, obstruct and impede, and did endeavor to influence, obstruct and impede the due administration of justice, to wit, ROMBOM impersonated an agent of the Federal Bureau of Investigation in order to intimidate a Government confidential informant in a pending criminal matter for which a trial is scheduled.

(Title 18, United States Code, Sections 1503 and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law-enforcement agents and others, and

my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my conversations with other agents of the FBI as well as my review of records, I have learned the following:

a. In or about January 2003, a grand jury sitting in the Southern District of New York returned a one count indictment against Albert Santoro, charging him with one count of money laundering, in violation of Title 18, United States Code, Section 1956(a)(3)(B). Trial in *United States v. Santoro*, 03 Cr. 484 (TPG) is currently scheduled for August 28, 2006.

b. The indictment was the result of an undercover investigation that relied, in part, on information that a confidential informant ("CI") provided to the FBI.

c. In correspondence and in court proceedings, Santoro's counsel has represented that Santoro's defense centers on the actions of the CI, including the allegation that the CI entrapped Santoro.

d. Santoro, through his attorney, hired Pallorium Inc., a private investigative company whose senior director is STEVEN ROMBOM, a/k/a "STEVEN RAMBAM," the defendant, to investigate the CI.

e. According to Pallorium's website, it has offices and affiliates worldwide.

4. Based on my conversations with the CI, I know that the CI is married. His spouse's mother, step-father and step-sister reside in Rosemead, California. ("The California family.")

5. In or about April and June 2006, assisted by a translator when necessary, I spoke individually with each member of the California family. From these conversations and my review of records, I learned, among other things, the following information:

a. On or about April 21, 2006, ROMBOM went to the California family's house. One of the California family members ("W-1") informed me that he saw ROMBOM exit a mid-sized sedan,

which was gold in color, and approach the door to the house. When W-1 answered the door, ROMBOM asked if the CI was present at the house. W-1 told ROMBOM that the CI was not there.

b. ROMBOM then entered the house. Upon entering, ROMBOM introduced himself to W-1 as a government investigator, quickly flashed what appeared to be an official government identification, and began to question W-1 about the CI. After W-1 told ROMBOM that he was the step-father of the CI's spouse, ROMBOM told W-1 to call his wife ("W-2") on her cell phone and tell her to return to the house. W-1 complied. After some time had passed and W-2 had not returned to the house, ROMBOM directed that W-1 again call W-2 and tell her to hurry up. W-1 complied.

c. When W-2 arrived at the house, ROMBOM introduced himself to her as an "FBI" agent, quickly flashing a wallet containing what appeared to W-2 to be a laminated card with an official government gold seal or badge.

d. ROMBOM told W-2 that he was investigating the CI and needed to ask W-2 questions about the CI. ROMBOM told W-2 in substance that the CI was a very bad and dangerous person and that there were many things about the CI that W-2 did not know, including that the CI had been in jail many times. ROMBOM showed W-2 what appeared to be a mug shot of the CI.

e. ROMBOM also showed W-2 some black and white photographs that appeared to have been taken recently of the CI and the CI's spouse (W-2's daughter.) W-2 indicated that the photographs appeared to have been taken through the front windows of the CI's apartment in New York, New York. ROMBOM told W-2 that he did not take the photographs personally but had a team of people in New York City who had taken the photographs.

f. ROMBOM also told W-2 information that he knew about the CI and W-2's daughter, including the names of the CI's children (W-2's grandchildren) and where W-2's daughter had gone to high school.

g. ROMBOM told W-2 that her daughter was in danger because of the CI and that ROMBOM was afraid for the safety of W-2's daughter.

h. ROMBOM repeatedly demanded that W-2 provide him with photographs of the CI and any correspondence to or from the CI. ROMBOM also questioned W-2 about where and how the CI worked.

i. While ROMBOM was questioning W-1 and W-2, the daughter of W-1 and W-2 ("W-3") came home. W-3 informed me that ROMBOM quickly opened and closed a wallet containing what appeared to be an official government identification card and began to ask W-3 questions. According to W-3, ROMBOM stated in substance that the CI was a very bad and dangerous person who had been in jail many times.

j. When ROMBOM left, he did not leave behind any business card or other materials, nor did he leave the California family with any way to contact him.

6. I have reviewed a court transcript that reflects that, at a court proceeding in *United States v. Albert Santoro*, a lawyer for ROMBOM informed the court that it was ROMBOM who went to the house of the California family.

7. I have reviewed records from a car rental agency that reflect that ROMBOM rented a vehicle on or about April 21, 2006 in the vicinity of the Los Angeles, California International Airport ("LAX"). Rosemead, where the California family lives, is approximately 31 miles from LAX. The records reflect that the car was a Buick LaCrosse, and was gold in color.

WHEREFORE, deponent prays that a warrant be issued for STEVEN ROMBOM, a/k/a "Steven Rambam," the above-named defendant, and that he be arrested and imprisoned, or bailed, as the case may be.

THEODORE V. CACIOPPI
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to
before me this 21st day
of July 2006

HONORABLE THEODORE H. KATZ
UNITED STATES MAGISTRATE