



U.S. Department of Justice

*United States Attorney
District of New Jersey*

*Peter Rodino Federal Building
970 Broad Street Suite 700
Newark, New Jersey 07102*

CONFIDENTIAL
NOT TO BE FILED

June 16, 2023

Honorable John M. Vazquez
United States District Judge
U.S. Post Office and Courthouse
One Federal Square
Newark, NJ 07102

Re: *United States v. Sean Caddle*, Crim. No. 22-46 (JMV)

Dear Judge Vazquez:

On January 25, 2022, defendant Sean Caddle pled guilty to an Information charging him with conspiring to travel in interstate commerce and using an interstate facility with the intent to commit murder-for-hire, contrary to N.J.S.A. § 2C:11-3, in violation of Title 18, United States Code, Section 1958. Caddle's conviction stemmed from his role in the murder of Michael Galdieri. Caddle is scheduled to be sentenced on June 29, 2023 at 2:00 p.m.

The Government below addresses each of the three steps of sentencing pursuant to *United States v. Booker*, 543 U.S. 220 (2005). *United States v. Goff*, 501 F.3d 250, 254 (3d Cir. 2007). At Step One, the uncontested Sentencing Guidelines Range calls for a term of life imprisonment. [REDACTED]

[REDACTED] Finally, at Step Three, the Government addresses the sentencing factors set forth in 18 U.S.C. § 3553(a) and recommends that the Court impose a sentence of 180-months' imprisonment.

CADDLE'S CRIMINAL CONDUCT

The Murder of Michael Galdieri

On May 22, 2014, at approximately 9:35 p.m., the Jersey City Police Department and Jersey City Fire Department (JCFD) received 911 calls reporting that there was a fire at 158 Mallory Avenue, in Jersey City, New Jersey that was concentrated on the second floor of the building. After JCFD responded and contained the fire, JCFD personnel located Galdieri's lifeless body in the home office of his apartment. Galdieri's body was discovered on the floor in a large pool of blood. Blood also was observed on the wall of the office near his body. JCFD personnel detected the odor of gasoline in the apartment and located a melted red plastic gas can in the apartment.

The Hudson County medical examiner determined that Galdieri died as a result of multiple stab wounds to the neck, head, and upper torso and concluded that the manner of death was homicide. The Hudson County Prosecutor's Office (HCPO) investigated the homicide and arson, but the case remained unsolved. Galdieri's murder remained a cold case until two separate armed bank robberies in Connecticut set into motion an investigation that led to the discovery of the murder-for-hire scheme.

In May 2015, Bomani Africa was arrested by the FBI for his role in two armed bank robberies that he, longtime accomplice George Bratsenis, and another co-conspirator committed in Connecticut in September and December of 2014. [REDACTED]

[REDACTED] During a proffer with the FBI and the USAO-CT in November 2015, Africa admitted his role in the bank robberies and stated that he committed them with Bratsenis. On December 16, 2015, Africa pled guilty in the District of Connecticut to armed bank robbery.¹

Bratsenis was arrested for his role in the bank robberies and ultimately pled guilty in the District of Connecticut in April 2016 to armed bank robbery.² Bratsenis

[REDACTED] disclosed, unprompted, that he had information regarding a homicide in

¹ On February 16, 2023, United States District Judge Jeffrey A. Meyer (D. Ct.) sentenced Africa to 120 months' imprisonment on the armed bank robbery charge.

² On April 5, 2022, Judge Meyer sentenced Bratsenis to 96 months' imprisonment on the armed bank robbery charge.

New Jersey. [REDACTED]

[REDACTED] Bratsenis detailed that Caddle—a New Jersey-based political consultant—hired Bratsenis and Africa to murder Galdieri, one of Caddle’s employees. After developing additional evidence, law enforcement interviewed Africa, who confessed to his role in Galdieri’s murder.

According to Bratsenis, in 2013, after being released from prison, he started working for Caddle, who was running a state senate campaign in New Jersey. Bratsenis came to know Caddle through Caddle’s brother, who served a sentence in the same New Jersey prison as Bratsenis. Galdieri also worked for Caddle on the campaign and bragged to Bratsenis that he was the “envelope guy” or “bag man,” responsible for delivering money to various individuals. While he was working on the campaign, Bratsenis lived with Caddle, but returned to Connecticut after the November 2013 election.

In March or April of 2014, Caddle contacted Bratsenis and invited him to dinner at Caddle’s home in Jersey City. During the visit, Caddle acknowledged that he was aware of Bratsenis’ extensive criminal history, including a murder he committed in 1984. Caddle told Bratsenis that he wanted to have someone killed and asked Bratsenis if he could find someone to commit the murder for \$15,000.

Soon after this meeting with Caddle, Bratsenis told Africa—his long-time accomplice—about Caddle’s offer and Africa agreed that he would be willing to take the job. Bratsenis then drove back to New Jersey to meet with Caddle and advised Caddle that Africa was willing to commit the murder. At that point, Caddle explained to Bratsenis that Galdieri was the intended victim. Caddle told Bratsenis that he wanted Galdieri dead within 30 days and gave Bratsenis between \$2,000 and \$4,000 up front to commit the murder.

Bratsenis and Africa then surveilled Galdieri’s apartment several times and bought knives with which to commit the murder. On May 22, 2014, Bratsenis drove from Connecticut to a bus station in Newark, New Jersey, where he picked up Africa, who had traveled from Pennsylvania. Bratsenis and Africa then drove together to Galdieri’s apartment in Jersey City. Galdieri was expecting Bratsenis’ visit because they had discussed Bratsenis robbing money from drug dealers in Jersey City who Galdieri had identified.

Not long after Galdieri let them in, Bratsenis and Africa stabbed Galdieri to death in his home office. Bratsenis used a plastic red gas can to douse the apartment in gasoline and set the apartment on fire. Surveillance footage obtained from the area surrounding Galdieri’s apartment showed that on the night of the murder, two individuals walked towards his apartment building and then later walked away from the scene. Both Bratsenis and Africa have confirmed that they are the two men

depicted in the video. Caddle learned of Galdieri's death that evening. Location information for Caddle's mobile phone reflects that he traveled to the vicinity of the murder scene near midnight on May 22, 2014.

The day after the murder, May 23, 2014, Bratsenis called Caddle to inform him that he and Africa had killed Galdieri. The same day, Bratsenis met with Caddle in the parking lot of a diner in Elizabeth, New Jersey. According to Bratsenis, they met in Caddle's car, where Caddle paid him a portion of the money owed for Galdieri's murder. Caddle had not brought enough cash with him, so he left the parking lot to withdraw an additional \$9,000 in cash from his political consulting firm's bank account at a branch in Union. Caddle then returned to the diner parking lot and gave Bratsenis the rest of the cash owed. Bratsenis then shared part of the proceeds with Africa.

The same day, Caddle was interviewed by HCPO officials about Galdieri's death. While Caddle discussed Galdieri's drug use and other aspects of Galdieri's personal life, he did not disclose his role in the murder.

Caddle pled guilty to his role in Galdieri's murder on January 25, 2022, while Africa and Bratsenis entered pleas to the murder-for-hire charge on January 26, 2022 and March 24, 2022, respectively. After granting the Government's substantial assistance motions, the Court sentenced Bratsenis to 192 months' imprisonment and Africa to 240 months' imprisonment.

The Scheme to Defraud Campaigns, PACs, and 501(c)(4)s

[REDACTED]

[REDACTED] Caddle explained that between 2014 and 2018, he and Teixeira conspired to defraud various campaigns, political action committees (PACs) and Internal Revenue Code 501(c)(4) organizations (501(c)(4)'s) out of approximately \$107,800 by fraudulently over-inflating invoices that Caddle's consulting firms submitted to these organizations.

Caddle was hired by a former New Jersey State Senator (Official-1) to create the PACs and 501(c)(4)'s so that they could raise and spend money to advocate on a variety of issues, including supporting particular candidates in races around New Jersey. During the charging period, Teixeira served as Official-1's Chief of Staff and wielded influence over the consultants that the campaigns and organizations hired and the budgets that each of these organizations received.

Teixeira and Caddle hatched a plot to falsely inflate the invoices that Caddle's consulting firms submitted to the campaigns, PACs, and 501(c)(4)'s with phony campaign-related expenditures. Caddle and Teixeira were fraudulently padding the invoices because they agreed to split the delta between Caddle's actual campaign expenditures and the overage charged to the organizations. Caddle paid a portion of Teixeira's end to him in cash and funneled the remainder to Teixeira via checks made out to Teixeira's father and then-wife to conceal that campaign money was being kicked-back to Teixeira.

In total, Teixeira received more than \$100,000 pursuant to the scheme. Although Teixeira pocketed these fraudulent proceeds and used the money for personal expenses, he never reported the monies on the Forms 1040 that he filed with the IRS during the scheme.

On November 21, 2022, Teixeira pleaded guilty before this Court to one count of wire fraud and one count of tax evasion, based on his role in the invoice scheme and his failure to report the fraudulent proceeds to the IRS. His sentencing currently is scheduled for July 24, 2023.

DISCUSSION

STEP 1: THE ADVISORY GUIDELINES RANGE IS LIFE IMPRISONMENT

[REDACTED]
the base offense level is 43. [REDACTED] After considering Caddle's acceptance of responsibility, his total offense level is 40. [REDACTED] Caddle has no criminal history and is therefore in Criminal History Category I. [REDACTED] Based upon a total offense level of 40 and a criminal history category of I, the Guidelines imprisonment range is 292 to 365 months' imprisonment. [REDACTED] However, where, as here, a murder-for-hire conspiracy results in the victim's death, the statutory mandatory minimum is life imprisonment. Thus, under U.S.S.G. §5G1.1(b), the Guidelines sentence is also life imprisonment. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

STEP 3: THE 3553(a) FACTORS SUPPORT A SENTENCE OF 180 MONTHS' IMPRISONMENT

Moving to the third step, the Court must consider the advisory Guidelines range [REDACTED] and the remaining factors set forth in 18 U.S.C. § 3553(a) and determine what sentence to impose. The Court must give “rational and meaningful consideration of the factors enumerated in 18 U.S.C. § 3553(a)” and make an “individualized assessment based on the facts presented.” *United States v. Tomko*, 562 F.3d 558, 567-68 (3d Cir. 2009) (*en banc*) (internal quotation marks omitted).

Under § 3553(a), “[t]he Court shall impose a sentence sufficient, but not greater than necessary, to comply with the purposes” of sentencing. 18 U.S.C. § 3553(a). Those purposes are “(A) to reflect the seriousness of the offense, to promote respect

for the law, and to provide just punishment for the offense; (B) to afford adequate deterrence to criminal conduct; (C) to protect the public from further crimes of the defendant; and (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.” 18 U.S.C. § 3553(a)(2).

In determining that sentence, this Court must consider “the nature and circumstances of the offense and the history and characteristics of the defendant,” 18 U.S.C. § 3553(a)(1), “the kinds of sentences available,” § 3553(a)(3), the Guidelines and Guidelines range, § 3553(a)(4), the Guidelines’ policy statements, § 3553(a)(5), “the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct,” § 3553(a)(6), and “the need to provide restitution to any victims of the offense,” § 3553(a)(7).

Although not binding on the Court, the plea agreement between Caddle and the Government provides that if he satisfied all the conditions of his [REDACTED], the Government would recommend that the Court sentence him to between 12.5 to 25 years in prison. Consistent with that agreement [REDACTED] and the relevant 3553(a) factors, the Government recommends that the Court sentence Caddle to 180-months’ imprisonment. The Government arrives at this recommendation through careful consideration of the 3553(a) factors as well as our recommended sentences for Caddle’s conspirators, and explains its reasoning below.

Caddle’s crime was among the most serious a defendant can commit. He set into a motion the brutal murder of a friend. Caddle knew Galdieri for years; they worked together, and their families were acquainted. This was not just a fleeting crime of passion. It was a carefully planned, premeditated crime. And after it was done, Caddle—in a cold-hearted turn—attended the repast for Galdieri.

[REDACTED] Caddle explained to the Government his supposed motive for having Galdieri killed. Galdieri had worked for Caddle on campaigns for years. Over the course of their relationship, Galdieri would occasionally ask Caddle for money and favors. Caddle was concerned about Galdieri’s drug use but felt compelled to help him; he had known Galdieri for years, and Galdieri reminded Caddle in some ways of his younger brother, who had also struggled with drug addiction.

According to Caddle, in his final months, Galdieri had become increasingly erratic due to drug use and regularly asked Caddle for money. By Caddle’s telling, Galdieri eventually started extorting him, threatening that if Caddle did not continue to funnel money to Galdieri, he would go public about certain things he had seen, done, and heard while working for Caddle on campaigns. Fearing that Galdieri’s

revelations would ruin him as a political consultant and cause his clients to abandon him, Caddle made the fateful decision to have Galdieri killed. In Caddle's version, Bratsenis was more than a willing confederate because he independently had considered murdering Galdieri for attempting to extort him about his own illegal activities. Bratsenis, for his part, claimed that Caddle approached him to commit the murder, purportedly because Galdieri was stealing from Caddle.


There is nothing redeeming about either version of the motive for this murder. And although Caddle did not wield the knives, or the gas can used to burn the apartment, Galdieri died by Caddle's orders. The promise of Caddle's money unleashed two violent, longtime criminals to carry out the brutal stabbing of Galdieri, forever removing an irreplaceable human life from this world. On behalf of the victim and his family, Caddle must be sufficiently punished.

With respect to mitigating factors, while Caddle, by his own admission, was no stranger to criminality in his campaign work, he does not have the extensive, violent criminal past of his co-conspirators. For that reason, Caddle does not present the same specific deterrence risk as either Bratsenis or Africa. The co-conspirators' motives also differed. Bratsenis and Africa killed Galdieri for money; while, under his telling, Caddle felt that the victim was extorting him and threatening his career.

Finally, in reaching our recommendation, the Government has considered its recommended sentences for the other conspirators, both of whom [REDACTED] cooperated. For Bratsenis, the Government recommended a sentence within the range of 150 to 180 months' imprisonment. Bratsenis self-disclosed the murder, but also carried it out and had a decades-long, violent criminal history that included a prior murder. For Africa, who provided important corroboration, but who had failed to disclose the murder, the Government recommended 180 to 216 months' imprisonment. Although the Court, in its discretion, sentenced Bratsenis and Africa to 192 months' and 240 months' imprisonment, respectively, the Government's recommendation for Caddle is informed by these prior recommendations.

Balancing these factors [REDACTED], the Government recommends that the Court sentence Caddle to 180-months' imprisonment.

CONCLUSION

 the Government respectfully submits that the Court should sentence Caddle to 180-months' imprisonment.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

/s/ Sean Farrell

/s/ Lee M. Cortes, Jr.

By: Sean Farrell
Lee M. Cortes, Jr.
Assistant U.S. Attorneys

cc: Edwin Jacobs, Esq.
Jordan Barbone, Esq.
Maria F. Garcia, USPO