

Judge Pauley

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA : INFORMATION

- v. -

ALI OKLU,

Defendant.

- - - - - x

12 CRIM 177

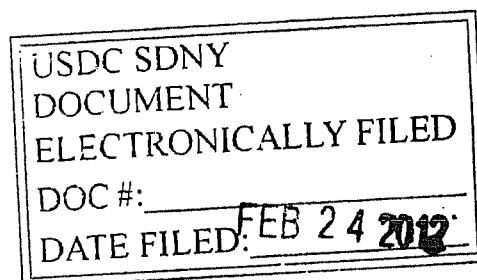
COUNT ONE

(Conspiracy to Transport Firearms Interstate)

The United States Attorney charges:

1. From in or about July 2011, up to and including in or about October 2011, in the Southern District of New York and elsewhere, ALI OKLU, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to violate Section 922(a)(3) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that ALI OKLU, the defendant, and others known and unknown, would and did transport into or receive in the State where a person resides a firearm purchased and otherwise obtained by such person outside that State, in violation of Title 18, United States Code, Section 922(a)(3).



Overt Act

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York:

a. On or about September 22, 2011, ALI OKLU, the defendant, transported firearms, some of which had been defaced, from New Jersey to New York via the Verrazano-Narrows Bridge.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Conspiracy to Transport Defaced Firearms Interstate)

The United States Attorney further charges:

4. At least in or about September 2011, in the Southern District of New York and elsewhere, ALI OKLU, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to violate Section 922(k) of Title 18, United States Code.

5. It was a part and an object of the conspiracy that ALI OKLU, the defendant, and others known and unknown, willfully and knowingly, would and did transport, ship, and receive, in interstate commerce, firearms which had the importer's and manufacturer's serial numbers removed, obliterated, and altered and would and did possess and receive firearms which had the importer's and manufacturer's serial numbers removed,

obliterated, and altered and had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(k).

Overt Act

6. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about September 22, 2011, ALI OKLU, the defendant, transported firearms that had serial numbers removed, obliterated, and altered from New Jersey to New York via the Verrazano-Narrows Bridge.

(Title 18, United States Code, Section 371.)

COUNT THREE

(Conspiracy to Transport and Receive Stolen Merchandise)

The United States Attorney further charges:

7. From in or about September 2010, up to and including in or about October 2011, in the Southern District of New York and elsewhere, ALI OKLU, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit offenses against the United States, to wit, to violate Sections 2314 and 2315 of Title 18, United States Code.

8. It was a part and an object of the conspiracy that

ALI OKLU, the defendant, and others known and unknown, willfully and knowingly, would and did transport, transmit, and transfer in interstate commerce goods and merchandise of the value of \$5,000 and more, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2314.

9. It was further a part and an object of the conspiracy that ALI OKLU, the defendant, and others known and unknown, willfully and knowingly, would and did receive, possess, sell, and dispose of goods and merchandise of the value of \$5,000 and more which have crossed a State boundary after being stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2315.

Overt Acts

10. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 25, 2011, ALI OKLU, the defendant, participated in transporting slot machines he believed had been stolen from Atlantic City, New Jersey to Port Chester, New York.

b. On or about May 9, 2011, ALI OKLU, the defendant, participated in the theft of more than 200 cases of cigarettes from trucks located in Virginia and the transportation

of the cigarettes to New York.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION
(Counts One and Two)

11. As the result of committing one or more of the offenses in violation of 18 U.S.C. § 922 alleged in Counts One and Two of this Information, ALI OKLU, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and (d)(3) and 28 U.S.C. § 2461(c), all firearms and ammunition involved and used in the commission of the said offenses.

FORFEITURE ALLEGATION
(Count Three)

12. As a result of committing the offense alleged in Count Three of this Information, ALI OKLU, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including, but not limited to, a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value;

or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 924 and 981 and Title 28, United States Code, Section 2461.)


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ALI OKLU,

Defendant.

INFORMATION

12 Cr. (WHP)

(18 U.S.C. §§ 371, 922(a)(3) and (k),
2314, and 2315.)

PREET BHARARA

United States Attorney.
