

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

SUPERSEDING
INDICTMENT

CHRISTOPHER NRECAJ, :

a/k/a "Dok," :

a/k/a "40," :

DAVID NRECAJ, :

a/k/a "DeeDee," :

FRANKIE FROKAJ, :

a/k/a "Frank," :

a/k/a "Frokes," :

a/k/a "Fat Boy," :

a/k/a "Freak," :

DEDA FROKAJ, :

a/k/a "D. Frokes," :

a/k/a "Danny," :

CORRY LOMBARDI, :

a/k/a "Gutter," :

JOSEPH CAMAJ, :

a/k/a "Joey," :

DRITON HAXHIJAJ, :

a/k/a "Tony," :

a/k/a "Tone," :

a/k/a "Tone Capo," :

a/k/a "Tone Capone," :

MARIA MANGIARDI, :

JOSEPH MITCHELL, :

a/k/a "Joey," :

GEORGE CEKAJ, :

a/k/a "G," :

a/k/a "Uncle G," :

STEPHEN CRIVILLARO, :

ALBERTO SPAGNUOLO, and :

JASON VILLALONA, :

a/k/a "J-Hood," :

Defendants. :

- - - - - X

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NARCOTICS OFFENSE

COUNT ONE

The Grand Jury charges:

Background

1. At all times relevant to this Indictment, CHRISTOPHER NRECAJ, a/k/a "Dok," a/k/a "40," DAVID NRECAJ, a/k/a "DeeDee," FRANKIE FROKAJ, a/k/a "Frank," a/k/a "Frokes," a/k/a "Fat Boy," a/k/a "Freak," DEDA FROKAJ, a/k/a "D. Frokes," a/k/a "Danny," CORRY LOMBARDI, a/k/a "Gutter," JOSEPH CAMAJ, a/k/a "Joey," DRITON HAXHIJAJ, a/k/a "Tony," a/k/a "Tone," a/k/a "Tone Capo," a/k/a "Tone Capone," MARIA MANGIARDI, JOSEPH MITCHELL, a/k/a "Joey," GEORGE CEKAJ, a/k/a "G," a/k/a "Uncle G," STEPHEN CRIVILLARO, ALBERTO SPAGNUOLO, JASON VILLALONA, a/k/a "J-Hood," the defendants, and others known and unknown, were members or associates of a criminal group known as the "Wolfpack" that was based in the Bronx, New York, and that operated in the Southern District of New York and elsewhere. The group planned and committed a variety of criminal acts as opportunities arose, including but not limited to, the distribution of cocaine, marijuana and prescription pills containing Oxycodone, weapons possession, and other crimes.

2. The members of the group communicated regularly about their criminal activities; developed areas of specialty and expertise with respect to the commission of crimes, and relied on

and utilized one another in those areas of specialty and expertise; shared phones, automobiles, weapons and other property used in the furtherance of their criminal activities; transported each other to and from their criminal activities; shared proceeds from successful criminal operations; and used violence against competitors to their criminal operations.

The Violation

3. From in or about 2008, up to and including in or about August 2012, in the Southern District of New York and elsewhere, CHRISTOPHER NRECAJ, a/k/a "Dok," a/k/a "40," DAVID NRECAJ, a/k/a "DeeDee," FRANKIE FROKAJ, a/k/a "Frank," a/k/a "Frokes," a/k/a "Fat Boy," a/k/a "Freak," DEDA FROKAJ, a/k/a "D. Frokes," a/k/a "Danny," CORY LOMBARDI, a/k/a "Gutter," JOSEPH CAMAJ, a/k/a "Joey," DRITON HAXHIJAJ, a/k/a "Tony," a/k/a "Tone," a/k/a "Tone Capo," a/k/a "Tone Capone," MARIA MANGIARDI, JOSEPH MITCHELL, a/k/a "Joey," GEORGE CEKAJ, a/k/a "G," a/k/a "Uncle G," STEPHEN CRIVILLARO, ALBERTO SPAGNUOLO, JASON VILLALONA, a/k/a "J-Hood," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

4. It was a part and an object of the conspiracy that CHRISTOPHER NRECAJ, a/k/a "Dok," a/k/a "40," DAVID NRECAJ, a/k/a "DeeDee," FRANKIE FROKAJ, a/k/a "Frank," a/k/a "Frokes," a/k/a

"Fat Boy," a/k/a "Freak," DEDA FROKAJ, a/k/a "D. Frokes," a/k/a "Danny," CORRY LOMBARDI, a/k/a "Gutter," JOSEPH CAMAJ, a/k/a "Joey," DRITON HAXHIJAJ, a/k/a "Tony," a/k/a "Tone," a/k/a "Tone Capo," a/k/a "Tone Capone," MARIA MANGIARDI, JOSEPH MITCHELL, a/k/a "Joey," GEORGE CEKAJ, a/k/a "G," a/k/a "Uncle G," STEPHEN CRIVILLARO, ALBERTO SPAGNUOLO, JASON VILLALONA, a/k/a "J-Hood," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

5. The controlled substances involved in the offense were (1) 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B); (2) 100 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B); and (3) mixtures and substances containing a detectable amount of Oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

FIREARMS OFFENSES

COUNT TWO

The Grand Jury further charges:

6. From at least in or about 2010, up to and including in or about 2012, in the Southern District of New York, CHRISTOPHER NRECAJ, a/k/a "Dok," a/k/a "40," DAVID NRECAJ, a/k/a "DeeDee," and FRANKIE FROKAJ, a/k/a "Frank," a/k/a "Frokes," a/k/a "Fat Boy," a/k/a "Freak," the defendants, willfully and knowingly, and during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, to wit, CHRISTOPHER NRECAJ, DAVID NRECAJ and FRANKIE FROKAJ used, carried, and possessed firearms in the Bronx, New York and aided and abetted the use, carrying, and possession of firearms in the Bronx, New York, during and in relation to a conspiracy to distribute cocaine and marijuana.

(Title 18, United States Code, Sections
924(c)(1)(A)(i) and 2.)

COUNT THREE

The Grand Jury further charges:

7. In or about March 2012, in the Southern District of New York, CHRISTOPHER NRECAJ, a/k/a "Dok," a/k/a "40," the defendant, after having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, willfully, and knowingly did possess in and affecting commerce a firearm, to wit, a Glock handgun, which previously had been shipped and transported in interstate and foreign commerce. (Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).)

COUNT FOUR

The Grand Jury further charges:

8. On or about August 10, 2012, in the Southern District of New York, CHRISTOPHER NRECAJ, a/k/a "Dok," a/k/a "40," the defendant, after having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, willfully, and knowingly did possess in and affecting commerce a firearm, to wit, a Smith & Wesson handgun and a Mossberg shotgun, which previously had been shipped and transported in interstate and foreign commerce. (Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).)

FORFEITURE ALLEGATION AS TO COUNT ONE

6. As a result of committing the controlled substance offense alleged in Count One of this Indictment, CHRISTOPHER NRECAJ, a/k/a "Dok," a/k/a "40," DAVID NRECAJ, a/k/a "DeeDee," FRANKIE FROKAJ, a/k/a "Frank," a/k/a "Frokes," a/k/a "Fat Boy," a/k/a "Freak," DEDA FROKAJ, a/k/a "D. Frokes," a/k/a "Danny," CORRY LOMBARDI, a/k/a "Gutter," JOSEPH CAMAJ, a/k/a "Joey," DRITON HAXHIJAJ, a/k/a "Tony," a/k/a "Tone," a/k/a "Tone Capo," a/k/a "Tone Capone," MARIA MANGIARDI, JOSEPH MITCHELL, a/k/a "Joey," GEORGE CEKAJ, a/k/a "G," a/k/a "Uncle G," STEPHEN CRIVILLARO, ALBERTO SPAGNUOLO, JASON VILLALONA, a/k/a "J-Hood," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment, including but not limited to a sum in United States currency representing the amount of all proceeds obtained as a result of the controlled substance offense alleged in Count One of the Indictment.

Substitute Asset Provision

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

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;



(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value;
or

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

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

(Title 21, United States Code, Section 853.)


PREET BHARARA 
United States Attorney

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(18 U.S.C. §§ 922(g), 924(c)(1)(A)(i),
924(a)(2) and 2 and 21 U.S.C. § 846)

PREET BHARARA
United States Attorney.