



## FORFEITURE ALLEGATION

1. As a result of committing the offense alleged in this Information, defendant BENJAMIN DONALD BRUNNI shall forfeit to the United States pursuant to 18 U.S.C. § 924(d)(1), 21 U.S.C. § 853, 28 U.S.C. § 2461(c), and 49 U.S.C. § 80302(b), any and all property constituting or derived from any proceeds the said defendant 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 this Information, including but not limited to:

a. All of the defendant's right, title, and interest in the following specific property that the defendant agrees was lawfully seized subsequent to his arrest on or about September 9, 2016:

(i) Eight (8) Glock model handguns with obliterated serial numbers;

(ii) One (1) Smith and Wesson 5906 handgun with serial number TCB8801;

(iii) One (1) Anderson Assault Rifle with obliterated serial number;

(iv) One (1) Ruger Assault Rifle with obliterated serial number;

(v) One (1) Century Arms model firearm with serial number VZ08PM-012521;

(vi) One (1) J. Stevens Arms 12-gauge model shotgun with serial number 31250;

(vii) Three (3) AR 15 model firearm lower receivers and miscellaneous parts;

(viii) Nine (9) Glock model handgun boxes and one (1) Smith & Wesson model handgun box; and

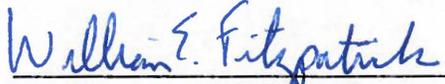
(ix) One (1) 2010 Mercedes GLK 350 automobile (Indiana Registration Number LE1770) with VIN# WDCGG8HB0AF43520.

Substitute Assets Provision

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

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

  
WILLIAM E. FITZPATRICK  
Acting United States Attorney

**CASE NUMBER: 17-**

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**BENJAMIN DONALD BRUNNI**

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**INFORMATION FOR**

18 U.S.C. §§ 922(a)(1)(A) and 2

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**WILLIAM E. FITZPATRICK**

*ACTING U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

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**DENNIS C. CARLETTA**

*ASSISTANT U.S. ATTORNEY*

*(973) 645-2767*

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