

PH:RMP  
F. #2020R00153

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JUN 18 2020 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No. **CR 20 219**  
(T. 21, U.S.C., §§ 841(b)(1)(A)(ii)(II), 846,  
853(a), 853(p), 952(a), 960(a)(1),  
960(b)(1)(B)(ii), 963 and 970; T. 18,  
U.S.C., §§ 2 and 3551 et seq.)

PAUL BELLOISI,

Defendant.

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**IRIZARRY, J.**

THE GRAND JURY CHARGES:

**KUO, M.J.**

COUNT ONE

(Conspiracy to Possess Cocaine with Intent to Distribute)

1. In or about February 2020, within the Eastern District of New York, the defendant PAUL BELLOISI, together with others, did knowingly and intentionally conspire to possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of cocaine involved in the conspiracy attributable to the defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was 5 kilograms or more of a substance containing cocaine.

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

**COUNT TWO**  
(Conspiracy to Import Cocaine)

2. In or about February 2020, within the Eastern District of New York and elsewhere, the defendant PAUL BELLOISI, together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 952(a) and 960(a)(1). The amount of cocaine involved in the conspiracy attributable to the defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was 5 kilograms or more of a substance containing cocaine.

(Title 21, United States Code, Sections 963 and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3551 et seq.)

**COUNT THREE**  
(Importation of Cocaine)

3. On or about February 4, 2020, within the Eastern District of New York and elsewhere, the defendant PAUL BELLOISI, together with others, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved 5 kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853(a) and 970, which require any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

5. 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 party;
- (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 divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a), 853(p) and 970)

A TRUE BILL

[REDACTED]

FORFEITURE

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RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY: [REDACTED]  
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. O.136

